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FEDERAL EFFORTS TO IDENTIFY AND REMOVE CONTAMINATED IMPORTED WINES

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HEARING

BEFORE A

SUBCOMMITTEE OF THE

COMMITTEE ON GOVERNMENT OPERATIONS HOUSE OF REPRESENTATIVES

NINETY-NINTH CONGRESS

SECOND SESSION

MAY 23, 1986

Printed for the use of the Committee on Government Operations

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FEDERAL EFFORTS TO IDENTIFY AND REMOVE CONTAMINATED IMPORTED WINES

WEDNESDAY, MAY 28, 1986

House of Representatives,
Commerce, Consumer, and
Monetary Affairs Subcommittee
of the Committee on Government Operations,
Washington, DC.

The subcommittee met, pursuant to notice, at 1 p.m., in room 2247, Rayburn House Office Building, Hon. Doug Barnard, Jr. (chairman of the subcommittee) presiding.

Present: Representatives Doug Barnard, Jr., and Ben Erdreich.

Also present: Representatives Frank Horton and Robert J. Mrazek.

Staff present: Stephen R. McSpadden, counsel; Faye Ballard, clerk; Alexander B. Cook and Scott Fisher, minority professional staff, Committee on Government Operations.

OPENING STATEMENT OF CHAIRMAN BARNARD

Mr. Barnard. The subcommittee will come to order.

Today the Commerce, Consumer and Monetary Affairs Subcommittee will examine the adequacy of Federal agency efforts to identify and remove contaminated wines, both imported and domestic, from the marketplace. In mid-July 1985, our Government first received reports of contaminated Austrian wines within the United States. Later, some German and Italian wines were implicated. In April of this year, there were a number of deaths in Italy reportedly caused by contaminated Italian wine. The purpose of this hearing is to determine how well the U.S. Government has responded to these recent events.

The subcommittee will hear from the General Accounting Office, which recently released a report, "Imported Wines—Identifying and Removing Wines Contaminated With Diethylene Glycol [DEG]," prepared at the request of the ranking minority member of the Government Operations Committee, Congressman Frank Horton, who is with us today.

The subcommittee will hear from senior officials of the Bureau of Alcohol, Tobacco and Firearms [BATF], and the Food and Drug Administration [FDA], both of which have jurisdiction over contaminated wine—or presume to have. Finally, we shall hear from two representatives of domestic wine producers, who will talk about the standards they follow to assure the purity and safety of wine.

The responses by these two agencies to the diethylene glycol scare last year, involving primarily Austrian wines, and to the more recent methanol contamination, involving some Italian wines, constitute two case studies of the Federal Government's ability to identify, test, and remove wines contaminated by toxic substances. We will seek answers to the following questions raised by the GAO's report and its followup work:

Are BATF's and FDA's statutory authority adequate, particularly their authority to require importers and wholesalers of wine to test for, submit reports on, and remove harmfully contaminated wine?

Do BATF or FDA routinely test wines for harmful contaminants?

Did FDA, the primary and most experienced agency for recalling harmful food products, defer responsibility and not provide guidance to BATF, whose authority and experience are limited to the mislabeling of alcoholic beverages? If so, why?

Did BATF sufficiently focus its notification and identification efforts on the importers of Austrian wine, rather than on wine importers in general?

Did BATF rely excessively on importers and wholesalers to remove contaminated wine, and did it monitor or verify importers' and wholesalers' actions in doing so?

Did BATF treat the DEG scare more as a mislabeling issue than a health-related one, by focusing its removal efforts on numerous Austrian, German, and Italian wines rather than on the few brands of Austrian wine posing the most significant risk to health?

Have BATF's efforts to find methanol-tainted wines been effective, and how have these efforts differed from BATF's actions on the DEG contamination?

And, finally, we want to determine what steps BATF and FDA may be taking to develop new policies and procedures, as recommended by the GAO.

I am frankly concerned by GAO's conclusion BATF's actions did not provide a high degree of confidence that all DEG-contaminated wines, particularly those with high levels of DEG, were identified and removed from the market. This raises two overriding questions for this hearing: Are there a number of harmfully contaminated wines still sitting on retailer shelves or in wholesaler warehouses? And, what happens if there is a next time? Will FDA and BATF be better prepared in the future to meet any threat caused by imported contaminated wines?

We are delighted to have with us today the senior ranking Republican member of the Government Operations Committee, Congressman Frank Horton of New York, and, Congressman Horton, would you have an opening statement at this time.

Mr. HORTON. Thank you, Mr. Chairman.

First of all, I want to express my appreciation to you for holding this hearing and, second, because I am not a member of this subcommittee, although I am an ex officio member, I do appreciate the opportunity to participate in this particular hearing.

At the outset also, Mr. Chairman, just so it is on the record, I have a couple of people that are friends of mine that are here and I would like to introduce them. They are not constituents, they are relatives. It is my nephew Billy, his wife Cathy Horton, and their little 14-month-old baby Joshua. So they are here for a few minutes Joshua is getting a little hungry so they won't stay through the hearings.

Mr. **Barnard.** We are delighted to have you with us. And I must say you must be proud of your esteemed uncle. I know we are.

Mr. **Horton.** Thank you, Mr. Chairman.

As you know, last spring I asked GAO to look into the manner in which our Government monitors the foods being imported into this country, to assure that such food meets our pesticide and chemical residue standards, as well as our food quality requirements. As a part of that investigation, following disclosure that some European wines were found to have been contaminated with diethylene glycol [DEG], I asked GAO to expand its inquiry to look specifically into the actions taken by our Government to assure that such contaminated wines did not reach U.S. consumers.

The GAO report of March 4, 1986, entitled "Imported Wines, Identifying and Removing Wines Contaminated With Diethylene Glycol" is the result of that investigation.

Very shortly after that report was issued, we read reports of contamination of Italian wines with methyl alcohol, a highly toxic substance. This hearing, therefore, is most timely to look into our Government's ability to respond to such a situation. Also, we can see whether the agencies involved have sufficient authority and internal planning to deal with these potential threats to the health of our citizens.

Mr. Chairman, as you know, I represent the Finger Lakes wine-producing region of New York State, and I work closely with the New York wine industry, and the American wine industry in general. And I know their problems and their potential.

I am glad that we will have the opportunity to hear from representatives of that industry today regarding the strict environmental standards, pesticide residue regulations, and processing requirements properly demanded of U.S. wine producers by our Government. If a substance such as DEG were found in an American wine, even in the most minute quantities, that wine would not be allowed to be sold, and would be totally recalled from the market.

In this regard, I am very pleased that not one U.S.-produced wine tested during this investigation was found to have even the slightest trace of DEG. Yet, the GAO reports that 81 different foreign wines available for sale in this country were found to contain DEG, some with as much as 19 grams per liter.

The Bureau of Alcohol, Tobacco and Firearms of the Treasury Department is the agency that assumed responsibility in this matter. The Bureau has authority to regulate the marketing of foreign wines pursuant to the Federal Alcohol Administration Act of 1935. Under that act, BATF must approve labeling of imported wines and can seize mislabeled wines pursuant to that act and a provision of the Internal Revenue Code. The GAO report concluded "* * * the way BATF dealt with DEG in wines does not provide a high degree of confidence that all DEG-contaminated wines were identified and removed from the market."

The GAO report sets out the details of BATF's actions regarding suspected contaminated wines. It questions the agency's approach to assure that all contaminated wines were actually removed from the market. It also suggests that a health-risk evaluation should have been made, and special efforts undertaken to find and remove the more highly contaminated wines from the market.

What particularly disturbs me is the inadequate identification and monitoring procedures taken by Federal agencies to ensure the safety of foreign wines. I look forward to hearing BATF's testimony today in this regard. I also am anxious to hear from the Food and Drug Administration as to their ideas regarding the public health issues present, as well as what they see as proper roles that FDA and BATF should assume in dealing with any future episodes of this kind.

I realize that the DEG problem may have been the first matter of this magnitude with which BATF has had to deal. The problems found by GAO also may be partly the result of the orientation of that agency, since it deals primarily with problems of mislabeled products, rather than issues of public health. Whatever the reason for such difficulties, I hope that we can translate this experience into a plan of action that will allow our Government to respond better in the future should such a problem arise.

Mr. Chairman, we need to ensure that all food products that enter the United States, whether it is wine, apple concentrate, orange concentrate, grape concentrate, whatever, including the 100-million-plus gallons of wine we import, meet the same standards we impose on our American growers and producers in order to protect the public from adulterated and unsafe foods and wine products.

I trust this hearing will move us closer to that goal.

Mr. Chairman, I join with you in welcoming the GAO, and I want to thank them for the job that they did, and they are still continuing a broader study of all of the problems that we have with other types of food products imported into this country.

I also want to join with you in welcoming the Bureau, the BATF, basically they were designed to in their job to check alcohol content, not for contaminants, and I also want to welcome the FDA representatives.

I am also glad we have representatives from the Wine Grape Growers of America and also from the New York Wine Council to talk about the requirements that they must meet, that is the domestic wines and American wines must meet in order to meet the standards that we lay down.

I would point out, Mr. Chairman, that the representative from New York Wine Council is John Martini, which is a little bit ironic but, Mr. Chairman, again, thank you for holding this hearing and I am looking forward to the testimony of the witnesses.

Mr. **Barnard**. Thank you, Mr. Horton.

This date was selected for this hearing not knowing then that it would fall during the Memorial Day recess, but we felt it was important enough not to postpone it any further. I do want to thank Mr. Erdreich from Alabama, who is with us today, for being with us and I am sure that this subject is of much interest to the other members of our committee, but, of course, because of scheduling conflicts elsewhere, they could not be here.

Mr. Erdreich, do you have an opening statement?

Mr. **Erdreich**. I just briefly would say, Mr. Chairman, I want to thank you for holding this hearing. I think we all share the concerns that you and Mr. Horton have voiced. I am particularly concerned about the degree to which FDA and BATF coordinated their activities here and I will be interested to hear from GAO's recommendations how the two agencies have set forth better procedures for future handling of occurrences like this.

The public health, of course, is at issue here. I think it is very important that BATF and FDA set forth clear procedures to deal with these sorts of occurrences and also let us hear and maybe these hearings will determine, whether they need to be changed to make clear the legislative authority to deal with this problem.

Thank you, Mr. Chairman, for holding these hearings.

Mr. **Barnard**. We are pleased and honored to have another distinguished Member of Congress, not a member of this committee, but someone who is very much interested in this subject, and that is Congressman Robert Mrazek of New York. Bob, if you would care to make an opening statement we would be delighted to hear from you at this time.

Mr. **Mrazek**. Thank you, Mr. Chairman.

I would like to thank you for allowing me to participate in these important hearings. As you just indicated in your opening statement a few moments ago, our purpose today is to examine the manner in which the FDA and the BATF have responded to problems within the last few months regarding the sale of wines containing unauthorized ingredients.

All of us share the concern that only wholesome foods and beverages be available for consumption by American consumers. All of us want to assure that Federal regulatory agencies are working constructively toward that goal.

I think to do so the agencies must be sure they are dealing with facts and not with assumptions and that they can make clear distinctions between products that pose a risk to the health of the American public and those that do not.

In this period of limited resources when the Federal Government is cutting back on personnel to deal with many issues of serious public concern, I think it is crucial that Federal agencies like the FDA and BATF concentrate on the genuine health hazards and not waste time and taxpayer dollars on regulatory activity when none is required.

I know that the witnesses today will focus on this important issue and address the question of how the FDA and BATF should in the future properly allocate their resources to discharge their responsibilities in dealing with alcoholic beverages, whether domestic or imported, which contain unsafe levels of any unauthorized ingredients.

I emphasize in particular my hope that witnesses will resist the temptation to use these hearings to gain some type of competitive advantage. Obviously that is not the purpose of these hearings. The question is public health, and not competitive gain.

I believe that this subcommittee should also address another related question. I think it would be inappropriate for us in Congress to criticize Federal agencies responsible for protecting the public for failing to act with sufficient vigor if we are simultaneously cutting off the resources or cutting back on the resources that these agencies need to get the job done.

I am especially interested in hearing from the FDA and the BATF as to whether they have adequate field and laboratory personnel and sufficient testing equipment to monitor the ingredients of alcoholic beverages and act swiftly and thoroughly when it comes to light that any beverages containing these unauthorized ingredients would be on the market for public consumption in the United States.

Again, Mr. Chairman, I would like to thank you for allowing me to participate in these hearings.

Mr. BARNARD. Thank you, sir.

Our first witness today will be Mr. Hugh J. Wessinger, Senior Associate Director of Resources, Community and Economic Division.

Mr. Wessinger, if you will take the witness stand. We welcome you to these hearings today. We appreciate the study that the GAO has done and we are delighted to have you with us to report on your study. Would you care to introduce your two associates with you today.

STATEMENT OF HUGH J. WESSINGER, SENIOR ASSOCIATE DIRECTOR, RESOURCES, COMMUNITY, AND ECONOMIC DEVELOPMENT DIVISION, GENERAL ACCOUNTING OFFICE, ACCOMPANIED BY KEVIN DONOHUE, GROUP DIRECTOR, AND RALPH DOMENICK, ASSIGNMENT MANAGER

Mr. WESSINGER. Thank you very much, Mr. Chairman. We are pleased to be here today.

On my left is Mr. Kevin Donohue, Group Director, who works in the environmental area on pesticides and was largely responsible for the report that we will discuss with you today.

On my right is Mr. Ralph Domenick, Assignment Manager, also who works heavily in the pesticides area and is quite an expert in this area.

Mr. BARNARD. Thank you, gentlemen, we welcome you to these hearings today.

Mr. Wessinger, as is customary, your entire testimony will be included in the record, and you may summarize as you so desire. But I have a request to make of you, and that is that you would include in your oral testimony today appendix 4. It is a very, very telling testimony, and I think your including it will probably eliminate some of the questioning that some members of the committee might have on your study. So if you would, when you get to that point, I think it is only about another 8 minutes—go ahead and include that in your oral testimony, it would be appreciated.

Mr. WESSINGER. I would be glad to do so.

Mr. BARNARD. With that, we will hear from you at this time.

Mr. WESSINGER. As I said I am pleased to be here today to discuss our recent report on Federal agency actions in dealing with imported wines contaminated with the industrial chemical, diethylene glycol, which I will refer to as DEG. DEG is a highly toxic substance used in a number of industrial applications, including uses as a component and solvent in antifreeze and automotive brake fluids.

Last October Congressman Frank Horton expressed concern over the contamination of imported wines and asked us to review the manner and extent of actions taken by the Department of Health and Human Services' Food and Drug Administration [FDA] and the Department of Treasury's Bureau of Alcohol, Tobacco and Firearms to identify and halt the sale of wines contaminated with DEG.

Wines containing DEG came to the attention of U.S. authorities through an article in the Washington Post on July 12, 1985, describing West Germany's detection of contaminated Austrian wines. Within a week the Canadian Food and Drug Administration notified the Bureau that it had tested and found some contaminated Austrian wines.

The Austrian Government was initially unable to determine if contaminated wines had been exported to the United States. On July 18, 1985, the Bureau initiated a testing program to try to identify which contaminated wines had entered the U.S. market. Subsequently, the Bureau received information from the Governments of West Germany, the United Kingdom, and Canada, that DEG was also found in some West German and Italian wines. As a result, the Bureau began testing these wines for DEG in August 1985.

What is DEG? As I mentioned, DEG is a highly toxic substance used in a number of industrial applications. In 1937 a pharmaceutical preparation, elixir, containing 72 percent DEG caused more than 100 deaths across the United States.

DEG is illegal in wine and food products at any level. It is a colorless liquid having a sweet taste. DEG has reportedly been used by Austrian winemakers as a sweetening agent since as early as 1979, allowing producers to bypass the more expensive and time-consuming fermentation process. How DEG got into Italian and West German wines is uncertain.

I will summarize the findings of our report regarding the extent to which the Bureau and FDA test wines for contaminants.

Neither the Bureau nor FDA routinely test wine for the presence of contaminants. FDA is responsible for preventing the importation of adulterated food and beverages. Although FDA tests samples of domestic and imported food products for adulteration, FDA does not usually test imported alcoholic beverages for contaminants, such as DEG. The Bureau normally samples alcoholic beverages to determine ingredient levels and to verify the accuracy of the labeling under its authority over mislabeled imported alcoholic beverages.

These tests cannot determine the presence of contaminants, such as DEG, since its detection requires a specific test that the Bureau normally does not use. Since the discovery of DEG in Austrian wines, the Bureau started testing for the presence of DEG as part of its regular wine sampling program.

The Bureau began testing Austrian wines for DEG's presence on July 18, 1985, and West German and Italian wines in August *1985*. Through December 3, 1985, Bureau testing found 81 different brands of contaminated wines and our report focused on these 81.

Subsequently, the Bureau has reported 14 additional contaminated wines.

The Bureau initiated a DEG-testing effort because it decided that it could conduct the testing more quickly than FDA. The Bureau informed FDA officials that it had developed a testing strategy for detecting Austrian wines contaminated with DEG. According to FDA officials, FDA concurred with the Bureau's decision and deferred to the Bureau on the testing of wines for DEG.

There are about 1,800 different Austrian wines approved by the Bureau for importation into the United States, and Bureau officials estimate that about one-half of these, about 900, are still actively being imported. The Bureau adopted a dual approach for addressing the problem of contaminated Austrian wines in the U.S. market. First, the Bureau asked the U.S. Customs Service to hold all shipments of Austrian wine entering the United States after July 18, 1985, until testing conducted at Bureau laboratories could determine if the samples were free of DEG.

If the Bureau found that the wine contained DEG, Customs was directed to refuse entry. Second, the Bureau requested that wholesalers and importers of Austrian wine have private laboratories test samples of all Austrian wine that they imported prior to July 18, 1985, and that were still under their control, to determine if they were free of DEG.

Bureau officials told us that importers and wholesalers were notified of the need to test their Austrian wines for DEG. The Bureau estimated that there may be more than 500 different importers that have Bureau approval to import Austrian wines. In addition, Bureau officials indicated that an unknown number of wholesalers which they believed to be many more than the number of importers, handle Austrian wines.

Bureau officials informed us that they had received results on private laboratory testing from 26 different importers or wholesalers covering 330 wines.

By requiring importers and wholesalers to have samples of all Austrian wines under their control tested for DEG by private laboratories and by conducting its own tests of all Austrian wines entering the United States after July 18, 1985, the Bureau made an effort to have all Austrian wines tested for DEG that are currently being marketed in the United States. The extent to which the Bureau was successful in getting all Austrian wines tested for DEG is unknown because the Bureau did not identify which importers and wholesalers sold and distributed Austrian wines, nor did it identify which Austrian wines were currently being marketed in the United States.

As a result, the Bureau lacked the information necessary to (1) effectively monitor and review the actions of the importers and wholesalers in complying with the testing requirements and (2) determine the extent to which Austrian wines currently marketed in the United States were in fact tested.

In addition to testing by importers and wholesalers, the Bureau tested samples of Austrian wines in its laboratories located in San Francisco, CA, and Rockville, MD. The samples tested by the Bureau included wines detained by Customs, samples of wine collected from retail outlets by Bureau personnel, and samples of wines sent to the Bureau by wine dealers and consumers. The wines selected for testing by Bureau personnel included suspected brands and others judgmentally selected by Bureau personnel.

Suspected brands included brand names similar to those previously found to be contaminated as well as other brands imported from these producers.

The Bureau tested 364 samples of Austrian wine through December 3, 1985. However, the number of Austrian wines represented by these samples could be considerably less because duplicate samples of some wines were tested. The Bureau found that 86 of the Austrian wine samples contained DEG and that these 86 samples represented 54 different wines indicating a duplication rate of about 37 percent—32 out of 86.

The Bureau's approach for the West German and Italian wines was different from its approach for identifying contaminated Austrian wines. Unlike the Austrian wines, the West German and Italian wines were not stopped at ports of entry by the U.S. Customs Service nor tested for DEG by the Bureau prior to the Customs' release. In addition, the Bureau did not request importers and wholesalers of West German and Italian wines to have private laboratories test their wines.

According to Bureau officials, the testing of West German and Italian wines was limited because of the effort that would be required to test the large volumes of these wines. In 1984 the United States imported 174,000 gallons of still (nonsparkling) wines from Austria; 16 million gallons from West Germany; and 63 million gallons from Italy. Another factor influencing this decision was the information from the British, Canadian, and West German Governments indicating that the DEG levels found in these wines were significantly lower than that found in Austrian wines.

Testing of West German and Italian wines was limited to the testing of selected brands by the Bureau and samples sent to the Bureau by outside sources such as wine dealers and consumers. The selected brands included some suspected brands and others judgmentally selected by Bureau personnel. The suspected Italian brands included those identified by the British and Canadian Governments. Suspected West German brands included those wines from the same producers or regions of Germany where wines were found to contain DEG by the West German, Government.

Mr. Chairman, we have prepared chart A (appendix I) here, to show you the results of Bureau testing. Bureau laboratory documents indicate that 1,167 foreign wine samples were tested for DEG through December 3, 1985. In addition, the Bureau tested 224 samples of domestic wines. DEG was found only in Austrian, West German, and Italian wines.

Because some wines were tested more than once by the Bureau, the number of wines tested is less than the number of samples tested. The Bureau did not keep track of the actual number of different wines that were tested. Bureau testing found DEG in 127 of the wine samples it tested and determined that, because of duplicate testing of some brands, the contaminated samples represented 81 different imported wines. These 81 wines consisted of 54 Austrian, 20 Italian, and 7 German.

Chart B (appendix II) presents the ranges of DEG found by Bureau testing. The DEG found in Austrian wines ranged from 0.1 to 19.66 grams per liter. The contaminated West German and Italian wine samples had much lower DEG levels. The several contaminated German wines contain DEG levels ranging from 0.005 to 0.1 grams per liter. The 20 contaminated Italian wines contain DEG levels ranging from 0.009 to 0.06 grams per liter.

Mr. **Barnard.** At this point, Mr. Wessinger, my understanding is that any degree of DEG contamination is against the law?

Mr. **Wessinger.** That is right. That is not an approved ingredient. It cannot be in any wines at all.

The chart B also shows the DEG ranges as parts per million.

Let me now discuss the toxicity and health risk associated with these DEG levels. On the basis of the 1937 elixir episode, researchers have concluded that the toxic effects of DEG in humans varies with the age, weight, and especially the health of an individual. Various toxicology evaluations have addressed the DEG doses that may be fatal to humans and the range of DEG doses that may have cumulative effects.

These evaluations indicate that consuming DEG could pose harmful effects to humans either as a single dose or by repeated doses over a period of time.

Chart C (appendix III) presents summary information on the 81 contaminated wines and the amount of the DEG found, with references to associated toxicity. The chart shows that about two-thirds of the Austrian wines had DEG levels over 1 gram per liter. Our chart shows that five of the contaminated Austrian wines contain DEG levels that research has shown could cause adverse health effects. A July 1985 FDA Division of Toxicology DEG evaluation determined that crystals and stones may begin to form in the kidneys through ingesting from 6 to 12 grams (about 0.2 to 0.4 ounces) of DEG per day. According to the author of this evaluation, a person in poor health could develop these symptoms after several days of ingesting DEG at these levels.

Various toxicology studies address the fatal doses of DEG. The July 1985 FDA evaluation based on the elixir episode states that some fatalities occurred with DEG levels as low as about 24 grams. In addition, press articles have reported that the Austrian Ministry of Health has stated that the consumption of 14 grams could be lethal to someone in poor health. Two of the Austrian wines contain more than 14 grams.

Looking now at the Bureau actions to get contaminated wines removed from the market, the Bureau relied on the importers and wholesalers to remove all contaminated wines from the market, but it did not routinely observe or review importers and wholesalers' action to doing so. Consequently, the Bureau does not know the extent to which wines contaminated with DEG were removed from the market.

The Bureau did not generally observe the actions of the importer or subsequently review importers' action to verify that the contaminated wine had been removed from the market. And the Bureau did not require the importer to report to the Bureau on its actions to remove the contaminated wines. For the most part, Bureau officials told us that their followup is limited to having its inspectors spot-check the wines on the retailers' shelves to see if any of the contaminated wines are still being sold.

What I have just presented is a summary of the major findings of our report. Subsequent to the issuance of the report, you asked us to obtain more information on four areas mentioned in our report. I will just go to appendix IV of my report rather than reading the summary.

We reported that the Bureau did not identify which importers and wholesalers sold and distributed Austrian wines, nor did it identify which Austrian wines were currently being marketed in the United States. Bureau officials said they did not do so because extensive time and effort would have been required.

The Bureau provided us with a computer list of Austrian wine labels it approved from 1979 through 1985 indicating vendor (or importer) code numbers. We analyzed this list and found that it contains 1,786 different Austrian wines approved for importation by 174 different importers. It took one staff person less than 3 hours to analyze the list. We believe that such an analysis by the Bureau would have helped it focus its notification and followup efforts.

Bureau officials informed us that they had received results on private laboratory testing from 26 different importers or wholesalers—the equivalent of about 15 percent of approved importers of Austrian wines. Because the Bureau did not determine those importers actively importing Austrian wines, they could not assess compliance with the testing and reporting requirement. It would seem to have been reasonable for the Bureau to have identified the importers of Austrian wines and to follow up with them to ensure that all such wines under their control were tested and the results sent to the Bureau.

Two, lack of a master list of contaminated wines. The Bureau issued 14 press releases to notify its field offices and the public of the wines its testing found to be contaminated. The press releases did not provide an updated listing of all contaminated wines; instead they only listed the contaminated wines found since the previous press release. As a result it was necessary to have all 14 press releases in order to compile a complete list of all contaminated wines.

Although we did not verify statements by Bureau regional officials, they indicated that they were not sure if they received all press releases. The Bureau did not compile a master list of all contaminated wines until December 1985. This list contains several gaps such as missing DEG levels for two wines and missing code numbers or vintage years for others.

Three, problems with Bureau recordkeeping. Bureau documentation was inadequate to verify the actions and results claimed by the Bureau officials. Its contacts with regional offices and importers were often by telephone with no summary records maintained. Regional directors who we contacted were not sure of the number of contaminated wines reported to them by headquarters nor the number of importers actually contacted by their staff.

In addition to the lack of documentation, Bureau documents contain numerous gaps and inconsistencies. For example, we were not able to confirm either the number or descriptions of the 81 contaminated wines because of discrepancies among Bureau documents. Also, we were not able to confirm either the total number of samples tested or the number of different brands represented by these samples.

Because of these recordkeeping problems, we frequently had to rely on the Bureau's best estimate and statements by Bureau officials describing their operations.

Better recordkeeping would have enhanced the Bureau's ability to effectively monitor and review the actions of importers in removing contaminated wines from the market. Improved recordkeeping would have also aided the Bureau in its attempts to identify those wines contaminated with DEG.

Four, GAO contacts with importers of highly contaminated Austrian wines. The 54 Italian contaminated wines were imported by 12 different importers; 4 importers handled 37—or 69 percent—of the 54 contaminated wines and handled the 5 wines with the highest levels of DEG. At your request we telephoned these four importers to obtain their description of the identification and removal of contaminated wines and their involvement with the Bureau.

The four importers recalled being contacted by the Bureau about the DEG issue by telephone and/or memorandum. Two of the importers contacted said that State authorities directed them to remove contaminated wines from the market. These States closely monitored their actions; for example, one State required the firm to destroy contaminated wines in their presence.

The four importers said they had removed all identified contaminated wine from the shelves that were under their control.

One importer was required by State authorities to remove all Austrian wines from retail outlets until the Bureau's testing indicated that the wine was free of DEG. One importer had only recently been notified about a brand of contaminated wine that was found by Bureau testing in August 1985 to contain DEG. Another importer stated that the Bureau would often contact his firm to inform them that a wine had been found to be contaminated with DEG, but the firm was already aware of this since State authorities had contacted his firm very promptly about wines identified through the Bureau's testing.

An importer who Bureau records indicate carried five contaminated brands claimed that his firm carries only one of the five brands; one of these four brands was the highest contaminated wine.

Although the importers contacted by us handle the brands with the highest levels of DEG, Bureau actions to ensure that these importers had indeed removed contaminated wines were limited. Although the importers recalled getting a few telephone calls from the Bureau, only one importer recalled Bureau staff visiting warehouses to verify that they were not selling any contaminated wines.

Let me now just turn to our conclusions and recommendations contained in our issued report.

Based on our review we concluded that the Bureau's efforts to verify importers' actions in testing and removing contaminated wines from the market were limited. The extent to which all wines were tested and all contaminated wines were removed from the market cannot be determined.

In addition, we believe that the Government efforts to find and remove DEG-contaminated wines need to provide an appropriate degree of assurance that wines with DEG in amounts representing a significant risk to health are identified and removed from the market. The Bureau did not conduct a risk assessment or seek an assessment from FDA to determine what amount of DEG in wine would represent a significant risk to health.

In the absence of such a health assessment, we concluded that Bureau actions do not provide a high degree of assurance that wines contaminated with DEG in amounts posing a significant risk to health were identified and removed from the market.

We recommended that the Bureau consult with FDA to determine whether the actions taken by the Bureau in sampling, testing, and having wines contaminated with the DEG removed from the marketplace were adequate to protect the public health and safety and to take whatever action is warranted as a result of these consultations.

We further recommended that the results of such consultation be used to develop appropriate policies and procedures for working with FDA regarding any future contamination of alcoholic beverages.

In addition, we recommended that the Director of the Bureau report to the appropriate oversight committees as well as to the House Government Operations Committee on the results of these consultations and any actions taken.

Mr. Chairman, this concludes my prepared statement. We would be pleased to respond to your questions.

[The prepared statement, with attachments, of Mr. Wessinger follows:]

UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D.C. 20548

FOR RELEASE ON DELIVERY
EXPECTED AT 1:00 P.M. EDT
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STATEMENT OF
HUGH J. WESSINGER, SENIOR ASSOCIATE DIRECTOR
RESOURCES, COMMUNITY, AND ECONOMIC DEVELOPMENT DIVISION

BEFORE THE
SUBCOMMITTEE ON COMMERCE, CONSUMER,
AND MONETARY AFFAIRS
OF THE
HOUSE COMMITTEE ON GOVERNMENT OPERATIONS
ON

FEDERAL ACTIONS IN DEALING WITH CONTAMINATED IMPORTED WINES

Mr. Chairman and members of the Subcommittee:

We are pleased to be here today to discuss our recent report[1] on federal agency actions in dealing with imported wines contaminated with the industrial chemical diethylene glycol (DEG). DEG is a highly toxic substance used in a number of industrial applications including uses as a component and solvent in antifreeze and automotive brake fluids. Last October Congressman Frank Horton expressed concern over the contamination of imported wines and asked us to review the manner and extent of actions taken by the Department of Health and Human Services' Food and Drug Administration (FDA) and the Department of Treasury's Bureau of Alcohol, Tobacco, and Firearms (Bureau) to identify and halt the sale of wines contaminated with DEG.

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[1] Imported Wines: Identifying and Removing Wines Contaminated With Diethylene Glycol, (GAO/RCED-86-112, March 4, 1986).

Wines containing DEG came to the attention of U.S. authorities through an article in The Washington Post on July 12, 1985, describing West Germany's detection of contaminated Austrian wines. Within a week the Canadian Food and Drug Administration notified the Bureau that it had tested and found some contaminated Austrian wines. The Austrian government was initially unable to determine if contaminated wines had been exported to the United States. On July 18, 1985, the Bureau initiated a testing program to try to identify which contaminated wines had entered the U.S. market. Subsequently, the Bureau received information from the governments of West Germany, the United Kingdom, and Canada that DEG was also found in some West German and Italian wines. As a result the Bureau began testing these wines for DEG in August 1985.

WHAT IS DEG?

As I mentioned, DEG is a highly toxic substance used in a number of industrial applications. In 1937 a pharmaceutical preparation (elixir) containing 72 percent DEG caused more than 100 deaths across the United States.

DEG is illegal in wine and food products at any level. It is a colorless liquid having a sweet taste. DEG has reportedly been used by Austrian winemakers as a sweetening agent since as early as 1979, allowing producers to bypass the more expensive and time-consuming natural fermentation process. How DEG got into Italian and West German wines is uncertain.

EXTENT TO WHICH THE BUREAU AND FDA TEST WINES FOR CONTAMINANTS

Neither the Bureau nor FDA routinely test wine for the presence of contaminants. FDA is responsible for preventing the importation of adulterated food and beverages. Although FDA tests samples of domestic and imported food products for adulteration, FDA does not usually test imported alcoholic beverages for contaminants, such as DEG. The Bureau normally samples alcoholic beverages to determine ingredient levels and to verify the accuracy of the labeling under its authority over mislabeled imported alcoholic beverages. These tests cannot determine the presence of contaminants, such as DEG, since its detection requires a specific test that the Bureau normally does not use. Since the discovery of DEG in Austrian wines, the Bureau started testing for the presence of DEG as part of its regular wine sampling program.

BUREAU ACTIONS

The Bureau began testing Austrian wines for DEG's presence on July 18, 1985, and West German and Italian wines in August 1985. Through December 3, 1985, Bureau testing found 81 different brands of contaminated wines and our report focused on these 81. Subsequently, the Bureau has reported 14 additional contaminated wines.

The Bureau initiated a DEG testing effort because it decided that it could conduct the testing more quickly than FDA. The Bureau informed FDA officials that it had developed a testing strategy for detecting Austrian wines contaminated with DEG. According to FDA officials, FDA concurred with the Bureau's decision and deferred to the Bureau on the testing of wines for DEG.

Identifying contaminated Austrian wines

There are about 1,800 different Austrian wines approved by the Bureau for importation into the United States, and Bureau officials estimate that about one-half of these (about 900) are still actively being imported. The Bureau adopted a dual approach for addressing the problem of contaminated Austrian wines in the U.S. market. First, the Bureau asked the U.S. Customs Service to hold all shipments of Austrian wine entering after July 18, 1985, until testing conducted at Bureau laboratories could determine if the samples were free of DEG. If the Bureau found that the wine contained DEG, Customs was directed to refuse entry. Secondly, the Bureau requested that wholesalers and importers of Austrian wine have private laboratories test samples of all Austrian wine that they imported prior to July 18, 1985, and that were still under their control, to determine if they were free of DEG.

Importer and wholesaler testing of Austrian wines

Bureau officials told us that importers and wholesalers were notified of the need to test their Austrian wines for DEG. The Bureau estimated that there may be more than 500 different importers that have Bureau approval to import Austrian wines. In addition, Bureau officials indicated that an unknown number of wholesalers (believed to be many more than the number of importers) handle Austrian wines. Bureau officials informed us that they had received results on private laboratory testing from

26 different importers or wholesalers covering 330 wine samples (not necessarily 330 different wines because the same wine may be sampled by different importers and wholesalers.)

By requiring importers and wholesalers to have samples of all Austrian wines under their control tested for DEG by private laboratories and by conducting its own tests of all Austrian wines entering the United States after July 18, 1985, the Bureau made an effort to have all Austrian wines tested for DEG that are currently being marketed in the United States. The extent to which the Bureau was successful in getting all Austrian wines tested for DEG is unknown because the Bureau did not identify which importers and wholesalers sold and distributed Austrian wines, nor did it identify which Austrian wines were currently being marketed in the United States. As a result, the Bureau lacked the information necessary to (1) effectively monitor and review the actions of the importers and wholesalers in complying with the testing requirement and (2) determine the extent to which Austrian wines currently marketed in the United States were in fact tested.

Bureau testing of Austrian wines

In addition to testing by importers and wholesalers, the Bureau tested samples of Austrian wines in its laboratories located in San Francisco, California, and Rockville, Maryland. The samples tested by the Bureau included wines detained by Customs, samples of wine collected from retail outlets by Bureau personnel, and samples of wines sent to the Bureau by wine dealers and consumers. The wines selected for testing by Bureau personnel included suspected brands and others judgmentally selected by Bureau personnel. Suspected brands included brand names similar to those previously found to be contaminated as well as other brands imported from these producers.

The Bureau tested 364 samples of Austrian wine through December 3, 1985. However, the number of Austrian wines represented by these samples could be considerably less because duplicate samples of some wines were tested. The Bureau found that 86 of the Austrian wine samples contained DEG and that these 86 samples represented 54 different wines indicating a duplication rate of about 37 percent (32 out of 86).

Identifying contaminated German and Italian wines

The Bureau's approach for the West German and Italian wines was different from its approach for identifying contaminated Austrian wines. Unlike the Austrian wines, the West German and Italian wines were not stopped at ports of entry by the U.S. Customs Service nor tested for DEG by the Bureau prior to Customs' release. In addition, the Bureau did not request importers and wholesalers of West German and Italian wines to have private laboratories test their wines.

According to Bureau officials, the testing of West German and Italian wines was limited because of the effort that would be required to test the large volumes of these wines. In 1984 the United States imported 174,000 gallons of still (nonsparkling) wines from Austria; 16 million gallons from West Germany; and 63 million gallons from Italy. Another factor influencing this decision was the information from the British, Canadian, and West German governments indicating that the DEG levels found in these wines were significantly lower than that found in Austrian wines.

Testing of West German and Italian wines was limited to the testing of selected brands by the Bureau and samples sent to the Bureau by outside sources such as wine dealers and consumers. The selected brands included some suspected brands and others judgmentally selected by Bureau personnel. The suspected Italian brands included those identified by the British and Canadian governments. Suspected West German brands included those wines from the same producers or regions of Germany where wines were found to contain DEG by the West German government.

RESULTS OF THE BUREAU TESTING FOR DEG IN WINES

Mr. Chairman, we have prepared Chart A (app. I) to show you the results of Bureau testing. Bureau laboratory documents indicate that 1,167 foreign wine samples were tested for DEG through December 3, 1985. In addition, the Bureau tested 224 samples of domestic wines. DEG was found only in Austrian, West German, and Italian wines.

Because some wines were tested more than once by the Bureau, the number of wines tested is less than the number of samples tested. The Bureau did not keep track of the actual number of different wines that were tested. Bureau testing found DEG in 127 of the wine samples it tested and determined that, because of duplicate testing of some brands, the contaminated samples represented 81 different imported wines. These 81 wines consisted of 54 Austrian, 20 Italian, and 7 German.

Chart B (app. II) presents the ranges of DEG found by Bureau testing. The DEG found in Austrian wines ranged from 0.1 to 19.66 grams per liter. (Note: a gram is about 0.035 ounces.) The contaminated West German and Italian wine samples had much lower DEG levels. The seven contaminated German wines contain DEG levels ranging from 0.005 to 0.1 grams per liter. The 20 contaminated Italian wines contain DEG levels ranging from 0.009 to 0.06 grams per liter. The chart also shows the DEG ranges as parts per million.

Let me now discuss the toxicity and health risk associated with these DEG levels. On the basis of the 1937 elixir episode, researchers have concluded that the toxic effects of DEG in humans varies with the age, weight, and especially the health of an individual. Various toxicology evaluations have addressed the DEG doses that may be fatal to humans and the range of DEG doses that may have cumulative effects. These evaluations indicate that consuming DEG could pose harmful effects to humans either as a single dose or by repeated doses over a period of time.

Chart C (app. III) presents summary information on the 81 contaminated wines and the amount of the DEG found, with references to associated toxicity. The chart shows that about two-thirds of the Austrian wines had DEG levels over 1 gram per liter.

Our chart shows that five of the contaminated Austrian wines contain DEG levels that research has shown could cause adverse health effects. A July 1985 FDA Division of Toxicology DEG evaluation determined that crystals and stones may begin to form in the kidneys through ingesting from 6 to 12 grams (about 0.2 to 0.4 ounces) of DEG per day. According to the author of this evaluation, a person in poor health could develop these symptoms after several days of ingesting DEG at these doses.

Various toxicology studies address the fatal doses of DEG. The July 1985 FDA evaluation based on the elixir episode states that some fatalities were observed with DEG levels as low as about 24 grams. In addition, press articles have reported that the Austrian Ministry of Health has stated that the consumption of 14 grams could be lethal to someone in poor health. Two of the Austrian wines contain more than 14 grams.

BUREAU ACTIONS TO GET CONTAMINATED WINES REMOVED FROM THE MARKET

The Bureau relied on the importers and wholesalers to remove all contaminated wines from the market but it did not routinely observe or review importers and wholesalers' action in doing so. Consequently, the Bureau does not know the extent to which wines contaminated with DEG were removed from the market.

The Bureau did not generally observe the actions of the importer or subsequently review importers' actions to verify that the contaminated wine had been removed from the market. And the Bureau did not require the importer to report to the Bureau on its actions to remove the contaminated wines. For the most part, Bureau officials told us that their follow-up is limited to having its inspectors spot-check the wines on the retailers' shelves to see if any of the contaminated wines are still being sold.

GAO FOLLOW-UP

The preceding discussion summarizes the major findings of our report. Subsequent to the issuance of our report you asked us to obtain more information on four areas mentioned in our report. Let me summarize the main points of each; Appendix IV of my prepared statement provides more detailed responses.

First, you asked us to discuss the Bureau's failure to identify Austrian wine importers. We concluded that it would have been reasonable for the Bureau to have identified the importers of Austrian wines to help focus its notification and follow-up efforts. Our analysis of a Bureau computer list of Austrian wine labels approved for importation found only 174 different importers and it took one staff person less than 3 hours to complete this analysis.

Second, you asked us to address the lack of a master list of contaminated wines. The Bureau did not maintain and disseminate a current master list of all contaminated wines. Instead the Bureau relied on press releases issued periodically to communicate the names of the latest wines it found to be contaminated. The Bureau did not compile a master list of all contaminated wines until December 1985.

Third, you asked us to discuss problems with the Bureau's recordkeeping. We noted gaps and inconsistencies in Bureau recordkeeping that in our opinion may have hampered the Bureau's ability to (1) ensure that all contaminated wines were identified and (2) effectively monitor the actions of importers in removing these wines from the market.

Finally you asked us to contact importers of highly contaminated Austrian wines regarding Bureau actions. At your request we telephoned the four importers of the most highly contaminated Austrian wines and found that Bureau actions to ensure that these importers removed contaminated wines from the market were limited.

CONCLUSIONS AND RECOMMENDATIONS

Based on our review we concluded that the Bureau's efforts to verify importers' actions in testing and removing contaminated wines from the market were limited. The extent to which all wines were tested and all contaminated wines were removed from the market cannot be determined.

In addition, we believe that government efforts to find and remove DEG contaminated wines need to provide an appropriate degree of assurance that wines with DEG in amounts representing a significant risk to health are identified and removed from the market. The Bureau did not conduct a risk assessment or seek an assessment from FDA to determine what amount of DEG in wine would represent a significant risk to health. In the absence of such a health assessment, we concluded that Bureau actions do not provide a high degree of assurance that wines contaminated with DEG in amounts posing a significant risk to health were identified and removed from the market.

We recommended that the Bureau consult with FDA to determine whether the actions taken by the Bureau in sampling, testing, and having wines contaminated with the DEG removed from the marketplace were adequate to protect the public health and safety and to take whatever action is warranted as a result of these consultations. We further recommended that the results of such consultation be used to develop appropriate policies and procedures for working with FDA regarding any future contamination of alcoholic beverages.

In addition, we recommended that the Director of the Bureau report to the appropriate oversight committees as well as to the House Government Operations Committee on the results of these consultations and any actions taken.

Mr. Chairman, this concludes my prepared statement. We would be glad to respond to your questions.

Chart A

Bureau Testing of Wines
(through December 3, 1985)

	Number of samples tested	Number of contaminated samples	Number of different brands found to be contaminated
Foreign			
Austrian	364	86	54
West German	438	9	7
Italian	298	32	20
Other countries	67	0	0
subtotal	1,167	127	81
Domestic	224	0	0
Total	1,391	127	81

Chart B

DEG Ranges in Contaminated Wines
(through December 3, 1985)

	DEG ranges (grams per liter)	DEG ranges (parts per million)
Austrian	0.1 to 19.66	100 to 19,660
West German	0.005 to 0.1	5 to 100
Italian	0.009 to 0.06	9 to 60

Note: a gram is about 0.035 ounces.

Chart C

DEG Levels in Contaminated Wines

	Number of contaminated wines		
DEG ranges per liter of wine	Austrian	German	Italian
Less than 1 gram	17	7	20
1 gram to 6 grams	30	0	0
6 grams to 12 grams[a]	3	0	0
Over 12 grams[b]	2	0	0
DEG levels not specified[c]	2	0	0
Total	54	7	20

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[a] A July 1985 FDA Division of Toxicology DEG evaluation determined that crystals and stones may begin to form in the kidneys through the repeated ingestion of 6 to 12 grams per day.

[b] A July 1985 FDA Division of Toxicology DEG evaluation based on the elixir episode states that some fatalities were observed with DEG levels as low as about 24 grams. In addition, press articles have reported that the Austrian Ministry of Health has stated that the consumption of 14 grams could be lethal to someone in poor health.

[c] DEG levels for 2 of the 54 Austrian wines were not identified in the records provided to us.

This section provides detailed responses to the four additional areas which were requested subsequent to the issuance of our report.

1. Bureau failure to identify Austrian wine importers

We reported that the Bureau did not identify which importers and wholesalers sold and distributed Austrian wines, nor did it identify which Austrian wines were currently being marketed in the United States. Bureau officials said they did not do so because extensive time and effort would have been required. The Bureau provided us with a computer list of Austrian wine labels it approved from 1979 through 1985 indicating vendor (or importer) code numbers. We analyzed this list and found that it contains 1,786 different Austrian wines approved for importation by 174 different importers. It took one staff person less than 3 hours to analyze the list. We believe that such an analysis by the Bureau would have helped it focus its notification and follow-up efforts.

Bureau officials informed us that they had received results on private laboratory testing from 26 different importers or wholesalers--the equivalent of about 15 percent of approved importers of Austrian wines. Because the Bureau did not determine those importers actively importing Austrian wines they could not assess compliance with the testing and reporting requirement. It would seem to have been reasonable for the Bureau to have identified the importers of Austrian wines and to follow-up with them to ensure that all such wines under their control were tested and the results sent to the Bureau.

2. Lack of a master list of contaminated wines

The Bureau issued 14 press releases to notify its field offices and the public of the wines its testing found to be contaminated. The press releases did not provide an updated listing of all contaminated wines; instead they only listed the contaminated wines found since the previous press release. As a result it was necessary to have all 14 press releases in order to compile a complete list of all contaminated wines. Although we did not verify statements by Bureau regional officials, they indicated that they were not sure if they received all press releases. The Bureau did not compile a master list of all contaminated wines until December 1985. This list contains several gaps such as missing DEG levels for two wines and missing code numbers or vintage years for others.

3. Problems with Bureau recordkeeping

Bureau documentation was inadequate to verify the actions and results claimed by the Bureau officials. Its contacts with regional offices and importers were often by telephone with no summary records maintained. Regional directors who we contacted were not sure of the number of contaminated wines reported to them by headquarters nor the number of importers actually contacted by their staff.

In addition to the lack of documentation, Bureau documents contain numerous gaps and inconsistencies. For example, we were not able to confirm either the number or descriptions of the 81 contaminated wines because of discrepancies among Bureau documents. Also, we were not able to confirm either the total number of samples tested or the number of different brands represented by these samples. Because of these recordkeeping problems we frequently had to rely on the Bureau's best estimate and statements by Bureau officials describing their operations.

Better recordkeeping would have enhanced the Bureau's ability to effectively monitor and review the actions of importers in removing contaminated wines from the market. Improved recordkeeping would have also aided the Bureau in its attempts to identify those wines contaminated with DEG.

4. GAO contacts with importers of highly contaminated Austrian wines

The 54 contaminated wines were imported by 12 different importers. Four importers handled 37 (or 69 percent) of the 54 contaminated wines and handled the 5 wines with the highest levels of DEG. At your request we telephoned these four importers to obtain their description of the identification and removal of contaminated wines and their involvement with the Bureau.

The four importers recalled being contacted by the Bureau about the DEG issue by telephone and/or memorandum. Two of the importers contacted said that state authorities directed them to remove contaminated wines from the market. These states closely monitored their actions; for example, one state required the firm to destroy contaminated wines in their presence. (Our review of the contamination issue centered on the Bureau's and FDA's involvement as agreed with the requester.) The four importers said they had removed all identified contaminated wine from the shelves that were under their control.

One importer was required by state authorities to remove all Austrian wines from retail outlets until the Bureau's testing indicated the wine was free of DEG. One importer had only recently been notified about a brand of contaminated wine that was found by Bureau testing in August 1985 to contain DEG. Another importer stated that the Bureau would often contact his firm to inform them that a wine had been found to be contaminated with DEG, but the firm was already aware of this since state authorities had contacted his firm very promptly about wines identified through the Bureau's testing. An importer who Bureau records indicate carried five contaminated brands claimed that his firm carries only one of the five brands; one of these four brands was the highest contaminated wine.

Although the importers contacted by us handle the brands with the highest levels of DEG, Bureau actions to ensure that these importers had indeed removed contaminated wines were limited. Although the importers recalled getting a few telephone calls from the Bureau, only one importer recalled Bureau staff visiting warehouses to verify that they were not selling any contaminated wines.

Mr. **Barnard**. Thank you very much.

Mr. Wessinger, is it your understanding that BATF believes that its actions were more than adequate to direct the removal of the wine?

Mr. **Wessinger**. I think they considered their actions adequate under the circumstances. I don't recall getting any comments to the contrary. Could I turn to my associates to respond.

Mr. **Donohue**. They believed they did an adequate job.

Mr. **Barnard**. At any time did the BATF indicate in meetings with GAO staff that it needed additional authority or did it believe that its authority was adequate?

Mr. **Donohue**. We discussed that fairly thoroughly with the agency. In fact, the Department got involved in it and they felt they had sufficient authority, including using some seizure authority through the Internal Revenue Code.

Mr. **Barnard**. So they didn't give any indication that they had no authority to proceed as they were proceeding, or even do more?

Mr. **Donohue**. They felt they had sufficient authority to handle the contamination problem.

Mr. **Barnard**. Now the reason I go into this is the following statement on page 4 of BATF's formal written testimony to the subcommittee, which states the following, and I quote, "BATF has no authority under the IRC"—that is the Internal Revenue Code—"or the FAA Act to require that importers and wholesalers obtain wine samples and remove suspect wines from retail premises either prior to or after a determination of contamination. BATF has no recall authority under either the IRC or FAA Act. ATF would rely on the voluntary compliance of importers and wholesalers to conduct such samplings and removal procedures."

Further, they say "ATF has no jurisdiction over the IRC or FAA Act with respect to requiring retailers and wholesalers to conduct tests prior to or after a determination.

"* * * ATF has no authority to require importers, wholesalers or retailers to submit reports on removals of wine from that retail level."

So the question is, what is your reaction and the reaction of the GAO staff which discussed the matter with the BATF?

Mr. **Donohue**. A little surprised, I guess. The first thing is that I don't believe they have authority to require the wholesalers or retailers to conduct such tests. But they use the permit authority to get the testing done. If the wholesalers and retailers don't test and remove any contaminated wines in both the DEG case and more recently in the methanol case, the Bureau told them that they would pull back their permits to do business.

I think that they use that. Maybe they don't have specific authority but they have sufficient authority according to the way we understand it in our dealings with them, to remove the contaminated wine. I believe that even FDA does not have the authority to require a recall. They have authority to seize, not necessarily recall. I think that both the Bureau and FDA could address both those issues better than we can.

Mr. **Barnard**. In other words, you didn't have the benefit of a prepared informal opinion on that subject.

Mr. DONOHUE. We did have an informal opinion from the Department of Treasury and the Bureau.

Mr. BARNARD. What did that say?

Mr. DONOHUE. That basically said that they had that authority. They had the authority to seize through the Internal Revenue Code.

[Informal legal opinion referred to is found in appendix 3A.]

Mr. DOMENICK. Mr. Chairman, at the time we were doing our review we did discuss this with the agency and the agency said they felt that they had the authority to handle the situation. They did make a distinction when they went out for testing by the importers. They did put it in the form of a request as opposed to a requirement. The reason they suggested was that it is illegal for the importer to sell a contaminated product. So consequently if a product was sold that BATF subsequently found to have been contaminated, the actual sale of it would have been illegal, even if it wasn't tested by the importer to find that out beforehand. That was our understanding of the situation.

Mr. BARNARD. Do you believe that this perceived lack of authority played any role in BATF's accepting test responses from only a small percentage of importers and not requiring the submission of reports from importers and wholesalers on their wines and removal actions?

Mr. WESSINGER. No, I don't really think so. They could have gone ahead and requested that even though there may have been question of legal authority to require it. I understand that that is the situation here. They asked the wholesalers and importers to test the wines, too. It was a request rather than a requirement that they test.

Mr. BARNARD. Well, in view of these gaps in authority, do you think that the FDA has abdicated its responsibility in passing on this job to the BATF?

Mr. WESSINGER. Certainly they had a role but I think it was appropriate that the two work together. There is some close ties between what the two agencies can do. There was a conscious decision on the part of the FDA to let the Bureau take the lead on this.

Mr. BARNARD. Even though there is a question even today as to whether or not BATF had the authority?

Mr. WESSINGER. They had—as I understand—the authority to make the test and to have the wines held at the docks by the Customs Service until they were tested. I think the question on the authority is whether they can require the importers to do anything. They can request them to do it.

Mr. BARNARD. I think we are going to have to have a better, fuller understanding from BATF because in their testimony, as I stated in my questioning, they indicated that there were some difficulties as far as their regulatory jurisdiction was concerned.

Mr. DONOHUE. Mr. Chairman, could I quote from an April 11, 1986, Product Alert from the Department of Treasury, Bureau of Alcohol, Tobacco and Firearms?

Mr. BARNARD. Sure.

Mr. DONOHUE. This is to wholesalers, importers of wine and others concerned. The bottom half states:

Under no circumstances should methanol-contaminated wine be sold. Italian wines found to have an unsafe level of methanol are considered by ATF to be mislabeled and not eligible for sale in the United States. Therefore, any wholesaler or importer who conducts transactions in any Italian wine on or after the date of this circular without having all brands tested for safe levels of methanol and whose wines are subsequently found to contain methanol in excess of one-tenth of 1 percent by volume will be considered by ATF to be in willful violation of the FAA Act and subject to suspension or revocation of the FAA basic permit.

[The complete Product Alert follows:]

INDUSTRY CIRCULAR

DEPARTMENT OF THE TREASURY
Bureau of Alcohol, Tobacco and Firearms
Washington, D. C. 20226
Number: 86-9 **Date:** April 11, 1986

-- PRODUCT ALERT -- PRODUCT ALERT -- PRODUCT ALERT --

METHANOL CONTAMINATION IN ITALIAN WINES

TO: WHOLESALERS AND IMPORTERS OF WINE AND OTHERS CONCERNED:

As you may already know, the Italian Government has disclosed that lethal amounts of methanol have been found in Italian wines, and its ingestion has contributed to 20 deaths in Italy. Lacking any evidence or real assurances from the Italian Government that no methanol contaminated Italian wine has been exported to the United States, ATF, as a precautionary measure, has placed a U.S. embargo on all Italian wine shipments pending the issuance of Italian certificates of analysis attesting to safe levels of methanol in Italian wines. These certificates of analysis will be issued by testing laboratories in Italy which have been certified by the Italian Ministry of Agriculture. Future shipments of all Italian wines will require this certificate of analysis prior to their release from Customs Custody.

In order to ensure that Italian wines already released from Customs Custody have not been contaminated with unsafe levels of methanol, all importers and wholesalers of Italian wines are advised to refrain from selling Italian wines until they have had each brand of wine in their inventory tested by a commercial laboratory and certified as having a safe level of methanol. It is also their responsibility to contact their retail customers and instruct them to withhold the sale of their Italian wines pending verification by laboratory analysis of safe levels of methanol in these wines. A safe level has been set by ATF to be 0.1% of methanol by volume of wine, per advice of the Food and Drug Administration. Copies of all laboratory analyses on Italian wines should be sent to ATF's Alcohol Import-Export Branch, P.O. Box 385 Washington, DC 20044-0385. If laboratory analysis discloses unsafe levels of Methanol, you are to notify ATF immediately at (202) 535-6245 for instructions as to the disposition of the wine. Under no circumstances should this methanol contaminated wine be sold.

PRODUCT ALERT

Italian wines found to contain unsafe levels of methanol are considered by ATF to be mislabeled and not eligible for sale in the United States. Therefore, any wholesaler or importer who conducts transactions in any Italian wines on or after the date of this circular, without having all brands tested for safe levels of methanol, and whose wines are subsequently found to contain methanol in excess of 0.1% by volume, will be considered by ATF to be in willful violation of the FAA Act and subject to suspension or revocation of their FAA Basic Permit.

Any person having questions concerning the laboratory analysis procedures required by this Industry Circular should contact ATF's National Laboratory Center in Rockville, Maryland at (301) 294-0410.

Upon receipt of this Industry Circular, you are instructed to notify immediately by letter, ATF's Regional Office that you have received a copy of this circular and advise them if you are a wholesaler or importer of Italian wines. This information will assist us in establishing a list for the purpose of follow-up inspections.

Stephen E. Higgins
Director

Mr. **Barnard**. So in other words, it is your interpretation that they did have the jurisdiction.

Mr. **Donohue**. Yes, sir.

Mr. **Barnard**. OK.

Mr. Wessinger, how many wholesale liquor dealers and importers are there in the United States who were presumably sent BATF's Product Alert when the DEG scare first broke out?

Mr. **Wessinger**. I believe the number is around 12,000, and that includes all importers and wholesalers.

Mr. **Domenick**. Well, that is new information to us. At the time of our review we tried to get a handle on how many different importers and wholesalers had actually been notified and asked to do something with respect to the Austrian wine. We were told that these people were contacted in various ways, by memorandums, by telephone calls and a lot of this was done by the regional offices. At the headquarters level we asked several times for an identification of the numbers of people involved and we were told that they didn't have an exact number of how many were contacted.

We contacted several regional offices and asked them how many importers and wholesalers in their regions were contacted and we got varying estimates and sometimes several estimates from the same region. So it was hard for us to come up with an exact number of who the notifications went to.

Mr. **Barnard**. But do you have any—today do you have any number?

Mr. **Domenick**. As we understand it based on data that BATF put together, there are something like 12,000.

Mr. **Barnard**. 13,000?

Mr. **Wessinger**. The number we have is 12,351.

Mr. **Barnard**. That is the number of dealers and importers?

Mr. **Wessinger**. Wholesalers, dealers, and importers.

[BATF's data showing these numbers follow:]

WHOLESALE LIQUOR DEALERS AND IMPORTERS

GRAND TOTAL WLD's and IMPORTERS: 12,351

	WLD's	IMPORTERS
North Atlantic Region:		
New York	1,125	900
Philadelphia	475	541
Southeast Region	687	619
Midwest Region:		
Chicago	1,495	432
Cincinnati	667	455
Southwest Region	1,290	351
Western Region	1,883	1,431
	WLD's	IMPORTERS
TOTAL	7,622	4,729

(STATISTICS AS OF 30 SEPTEMBER 1985)

Mr. **Barnard**. Just over 12,000. Have you any information as to how many retail establishments sell wine in the United States?

Mr. **Wessinger**. We do not know that.

Mr. **Domenick**. We had asked BATF at one point in time and they gave us an estimate of in excess of 300,000, but later on they indicated it may be as high as 600,000.

Mr. **Barnard**. How many inspectors does the BATF have to enforce the Alcohol, Tobacco and Firearms law?

Mr. **Domenick**. Roughly about 300, according to BATF's estimates.

Mr. **Barnard**. 300?

Mr. **Domenick**. Yes, sir.

Mr. **Barnard**. Do you know how many retail establishments BATF inspectors visited looking into contaminated wine?

Mr. **Domenick**. No, we do not, sir.

Mr. **Barnard**. Mr. Wessinger, could you describe GAO's contacts with the importers of the five most contaminated wines and indicate the DEG levels in those wines, in particular, what did you find out especially about the Michigan importer of the most contaminated wine, the one with the 19.7 grams per liter, as well as several lesser contaminated wines; and second, did the samples tested come from wines within the United States and was the importer's name on the label of the highest contaminated wines.

Mr. **Wessinger**. I will let Mr. Donohue answer that question. He is the one that has been involved in this subject in great depth.

Mr. **Donohue**. The five Austrian wines with the highest contamination contained 6.6, 8.8, 10.4, 6.0, and 19.66 grams per liter of DEG.

To put it in perspective, the Austrian Ministry, according to a newspaper article, said that 14 grams per liter could be lethal. The "elixir episode" showed that 24 to 26 grams could also be lethal. FDA stated that there could be some real serious problems between 6 and 12 grams per liter.

We contacted each one of these individuals and found that there were four importers involved, and that their contacts with BATF were limited. One of the main parts of the question deals with the importer who had five contaminated wines on the list from BATF and claimed that only one of those was his. As a result of that, we looked into the labels identified in the testing and in each case, the label identified him as the importer.

However, we did not go any further with this and we have not discussed it with BATF, so we don't know what the implications are of it.

However, BATF had limited involvement with these importers in removing and disposing of these wines which were the most highly contaminated wines. We felt that as a minimum that the followup work should at least center on these five wines which were in a range where they could cause some health problems.

Mr. **Barnard**. Mr. Donohue, what kind of distribution did each of these importers have? Did they have a wide distribution to wholesalers and retailers or did they have a limited distribution?

Mr. **Donohue**. It was mixed. Some of them had a relatively small number of outlets, others were widely distributed to several regions and States.

Mr. **Barnard**. Is it reasonable to believe that even today some of this highly toxic 19.6 grams per liter is still on the shelves of some of our retailers?

Mr. **Donohue**. I would hope not, but the possibility exists because no one verified whether all that wine was removed and disposed of.

Mr. **Barnard**. Mr. Erdreich.

Mr. **Erdreich**. Thank you, Mr. Chairman.

I have a couple questions, or more than a couple, but I was trying to get some idea of who determined the health risk, you mentioned in your report, the need for a health assessment.

It really bothers me that either the BATF or whoever else was involved, kind of took over jurisdiction after conferring briefly with FDA and then at least from the notes I have indicated that FDA happily deferred to BATF, that is one less job they have to get involved in.

But the determination of the risk, the chairman stated that any degree of the DEG level could be illegal, but that doesn't satisfy me. I was curious, did you in your review of this make a determination and find out who should be the agency to make the health determination?

Mr. **Wessinger**. Well, as we pointed out in the report we felt that that was FDA's responsibility to do that. In the report, we recommended that the Bureau should have gone to the FDA to have such a health risk assessment made for them so that they would know then what level of DEG they really needed to concentrate their efforts on to make certain that the harmful wine is removed from the market.

We felt that this would be a better application of the limited resources that the Bureau had. Once you know what that level is that is really harmful, you can concentrate your effort on getting those wines off the market.

Mr. **Erdreich**. That is really what I was getting at. Just looking at your chart C and seeing the various levels found in various wines analyzed, I would have hoped that they would concentrate on those that have the highest and greatest amount of grams in it as opposed to those that—I won't assume, but those that may not be a health risk.

As I understand it, if I understand correctly, the press releases that went out and notification to ATF regional offices was sort of a blanket notice and to me in part that seems like just reacting with a shotgun, do everything at once when really this should have been a zeroing in on those that appeared to be the higher risk.

In your investigation did you subsequently determine that there has been some procedure or coordination set up at the FDA to make that determination or do you have any information as what is a risk level of DEG?

Mr. **Wessinger**. No, we do not. We have not had the opportunity to follow up with the Bureau and FDA that such a determination has been made.

Mr. **Erdreich**. I also noted that during your investigation you determined that neither the Bureau nor FDA routinely test wine for the presence of contaminants. That is not done by any Federal agency?

Mr. **Wessinger**. That is correct, not on a routine basis. They do have sampling programs. The Bureau has a sampling program that it tests wines around the country, some 500 samples a year. Samples are taken to be tested for the ingredients on the label; to make certain the labels are proper.

Mr. **Erdreich**. Verify if there is mislabeling or not?

Mr. **Wessinger**. Right. It would not detect if there is DEG in that sample.

Mr. **Erdreich**. Also, apparently the Bureau would initiate its DEG testing; it decided it could conduct the testing more quickly than FDA.

What was the basis of that determination? The backlog was less?

Mr. **Wessinger**. One of the problems, as I understand, is FDA at that time was involved in another problem with the chemical that was in the watermelon. They were dealing with that last summer at the same time the DEG problem came along. I think that was one of the reasons why they were agreeable to letting the Bureau pick up the lead on this.

Mr. **Erdreich**. So what was—from the FDA point of view, what was their reason for the referral, if that is the right word for saying go ahead, BATF?

Mr. **Domenick**. One of the reasons was that, because of their role in issuing basic permits and issuing certificates of label approval, BATF was in a position to identify who the various players were out there that would be handling and dealing with these wines. From that standpoint, they could zero-in on where to go perhaps quicker than the FDA could.

The other thing was that ATF had given this some thought and come up with a testing methodology that they were prepared to go forward with. They went to FDA and said, in effect, we think we can handle this. FDA decided to defer to BATF in that regard.

Mr. **Erdreich**. Thank you, Mr. Chairman.

Mr. **Barnard**. Mr. Horton.

Mr. **Horton**. Thank you, Mr. Chairman.

Mr. Wessinger, are you aware of any health problems in Austria or elsewhere related to the consumption of DEG-contaminated wines?

Mr. **Wessinger**. No, I don't believe I am.

Mr. **Horton**. Did you contact any representative of the Austrian Government regarding your investigation?

Mr. **Wessinger**. No, we did not.

Mr. **Horton**. Do you know how the Austrian Government first became aware of the contamination of the wines with DEG?

Mr. **Wessinger**. We understand it was auditors checking some forms of records that showed the use of DEG in the winemaking process, and it caused questions to be raised. The subsequent investigation showed it was apparently being added to the wine.

Mr. **Horton**. Your report states that the DEG problem was first noted by our Government through an article in the July 12, 1985, Washington Post.

What are your thoughts about improving our methods to become aware of potential health hazards?

Mr. **Wessinger**. There is a problem in something like this. In trying to pick up everything, you would have to do an inordinate amount of testing, almost testing everything that comes into the country, to make certain everything is meeting our health standards. That would just be a horrendous task to try to test everything. I am not sure it would be practical to do that.

Short of that, I don't know how you could be certain everything being imported meets our public health standards.

Mr. HORTON. As you know, the earlier study which I requested, the broad study, has to do not only with wines but all imported foodstuffs, particularly apple concentrate, orange concentrates, and other concentrates that come into this country.

I am concerned. In my district, they grow a lot of apples up there. I know they have to meet certain restrictions in the United States with regard to growing apples, making apple juice, et cetera. So, my initial concern was about the standards for imported products.

As I understand it, there is something like $23 billion of foodstuffs that come into the United States annually. Basically, as a result of this specific study you made on this matter, it would appear we don't have a very reliable system of detecting contaminants in wine or any of these imported foodstuffs.

Is that basically what you found?

Mr. WESSINGER. I would say I would have to agree with you.

Mr. DOMENICK. The problem you get into is that with the domestic growers, if we talk about food in general, domestic growers are governed by certain rules and regulations in terms of what pesticides they can use, et cetera. A foreign grower is not governed by those same rules. However, there are limitations as to how much of what pesticide is allowed on specific food crops. To that extent, the residue that is allowed, those rules would apply to both domestically grown food as well as imported food.

The basic problem comes down to what do you look for? They can't test for everything. There isn't a test out there that allows you to screen a product that will identify everything that might be on there. So, there are hundreds of tests one might have to use to go through and look for everything that might be there. It becomes one of resources and a practical time problem. So the difficulty is knowing what to look for.

Mr. HORTON. How did the Canadian authorities find out about it?

Mr. DOMENICK. About the DEG in wine?

Mr. HORTON. Yes.

Mr. DOMENICK. As I understand it, it was in Austria around April 1985 that the suspicions started to occur that DEG was being used in the wines; and the Austrian Government, as I understand it, started to test their wines and confirmed some of this. As I understand it, there were a number of people indicted as a result of what the Austrian Government found. Initially, things were sort of held close to the vest and then some time passed before the information started coming out.

Mr. HORTON. Sort of like Chernobyl, I guess?

Mr. DOMENICK. Yes, sir.

I guess the reporter that broke the story was working in Europe and he learned of some of these things before we heard about them in this country.

Mr. BARNARD. Do you mean the Washington Post reporter?

Mr. DOMENICK. That is my understanding.

Mr. HORTON. As I understand it, the information came to this country through Canada; is that correct? Is that your understanding? In other words, our testing started after we got information from Canada?

Mr. DONOHUE. The equivalent of our FDA in Canada did some testing on imported wine, and found the DEG. BATF contacted the Austrians and they assured them that the DEG problem was just a problem in their country; it was not in the exports going to the United States. Which turned out to be very false. DEG was a problem over here, also. The Canadians eventually went ahead and tested anyway. That is how they found it. I don't know if they read the Washington Post first.

Mr. HORTON. BATF contends GAO was erroneous when you concluded the BATF had not maintained or disseminated a master list of contaminated wines until December 1985. They said such a list was prepared in July 1985.

Have you or your staff seen such a list?

Mr. DONOHUE. The first list we saw was in December 1985. There was no other list we were aware of. We asked for it previously and were told it was incomplete at that time.

Mr. DOMENICK. I think we are talking about two different kinds of master lists. Any list that existed in July 1985 preceded the testing by BATF. There may have been a master list of wines found to be contaminated by other countries, perhaps. If the testing did not start until after July 1985, the results of the BATF testing could not have been reported in July 1985.

Mr. HORTON. They said a list of contaminated wines was prepared in July 1985. You don't have any such list?

Mr. DOMENICK. We asked for a master list throughout the course of our review. It wasn't until December we got a master list. We were provided with copies of all the individual press releases issued over the course of time.

Mr. HORTON. On page 10 of BATF's testimony, which they will give later, they say in the middle of the page:

> GAO's assertion that no master list of contaminated wines was prepared until late December 1985, and then only in response to their request, is erroneous. A master list of contaminated wines was first prepared on July 18, 1985, and supplemented as new wines were found to be contaminated.

Mr. DOMENICK. We never saw any such list until December 1985, even when we asked for it previously to that.

[SUBCOMMITTEE NOTE.—The referenced December 1985 list and the press releases are found in appendix 3C.]

Mr. HORTON. On page 1 of FDA's statement and page 12 of the ATF statement says that FDA provided an informal health risk assessment to the BATF. Yet, you report that no assessment was made.

Have you seen such an assessment? Has that been furnished to you?

Mr. DOMENICK. There is a summary document that presented information on health risks associated with DEG. That is the basis for most of our information about health risks associated with DEG.

Mr. Horton. In the FDA testimony to be given later, on page 1 it says in summary that,

> While BATF engaged in a sampling and compliance program, a division of labor reflecting the role that each agency was best equipped to assume under those particular circumstances, the exposure to sufficient amounts of DEG from consuming contaminated wine could have serious health consequences, the actual likelihood of injury was low. Indeed, FDA is not aware of any reports due to the problem.

Did you have, or have you seen such an assessment?

Mr. Domenick. I think it comes down to what we are defining as "assessment." There is a 2-page summary document prepared by FDA and provided to BATF which summarizes the information that we included in our report about the toxicity of DEG. In our report, when we refer to a health assessment, what we are talking about is a determination by the agency responsible for making health risk assessments, what amount of DEG represents an amount of contaminant that will present a significant risk to health, as opposed to a contaminant that does not represent a significant risk to health.

This would be comparable to what FDA does when they set action levels on pesticide residues. In other words, what level of the residue will cause us to act to remove the food from the market as opposed to allowing it to continue into the marketplace. It is that decision as to what is the amount that should trigger our action that we said needed to be decided.

Mr. Horton. Mr. Chairman, staff just furnished me a copy of a document dated July 12, routing and transmittal slip, Dr. S.A. Miller, HFF, and apparently is taken from the files of FDA. It is a 3 page—perhaps we ought to put it in the record at this point.

Mr. Barnard. Without objection.

[The information follows:]

Kokoski

FILE

ROUTING AND TRANSMITTAL SLIP

Date July 12, 1985

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Dr. S. A. Miller HFF-1		
2.		
3.		
4.		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate		For Your information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

Sandy,

Here is the information you requested on the toxicity of diethylene glycol. It's brief and to the point. Hope this will be useful.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
CKokoski Charles J. Kokoski HFF-156	Phone No.

5041-102

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

GPO : 1982 O - 381-529 (230)

July 12, 1985

Diethylene Glycol (DEG) Toxicity

Animals:

Gaunt et al. study - Rats, 225 days, dietary.

. Oxalate Crystals in urine seen at .4% & 2%

. Oxalate Excretion in urine -

Minumum Effect Level (MEL) at 0.17%

. No-effect Level (NEL) at 0.085% (about 50 mg/kg b.w.)

Fitzhugh & Nelson - Rats, 2 years, dietary

. Bladder stones at 1%

. Bladder tumors & bladder stones at 2% & 4%

Humans:

Calvary & Klumpp - (1939) Case studies of 1938 Sulfanilamide Elixir episode.

25 ml DEG or above was fatal in humans in about 30% of the cases.

Extrapolation of DEG Toxicity to Humans:

. ADI (maximum acceptable daily intake) based on NEL of 0.085%, applying a 500-fold safety factor (because only 225 day study and one species), and for a 60 kg person is about 6 mg DEG.

(132 lbs)

. If one extrapolates directly from rat to a 60 kg man (using no safety factor), DEG is toxic to humans as follows:

- Minimum toxic effect (increased oxalate excretion) may be seen at 6 gm DEC/day (about 5.5 ml).
- Oxylate crystals in kidney may be seen at about 12 gm DEG/day (about 11 ml).

- Calvary and Klumpp stated (1939) that man may be more susceptible than other species, which may make above levels of DEG even more toxic to humans. Their opinion was based on 25 ml of DEG being fatal in some people and on the pathological findings from the 1938 sulfanilamide elixir episode.

Diethylene Glycol is not allowed as a direct food additive in 21 CFR Food Additive Regulations. It may occur as a contaminant limited to low levels in some ethylene oxide condensates (e.g. polyethylene glycol) used as food additives. However, any purposefully added DEG to food is not authorized by the regulations and any such imported food would be considered illegal.

Charles J. Kokoski, HFF-156

Mr. **Horton**. One further question.

Mr. Wessinger, in your opinion what is the best way to assure that contaminated wines that represent a public health hazard are identified and removed from the market?

Mr. **Wessinger**. I don't know that I have a solution to that, Mr. Horton.

Mr. **Horton**. Leave it up to the agency to determine that?

Mr. **Wessinger**. That is a good question. I think it is one we all have a justifiable need to be concerned about. Short of 100 percent testing, I just don't know how you can have that degree of assurance.

Mr. **Horton**. If you know something is a health hazard, if you have a suspicion, there ought to be some recall procedures, should there not be?

Mr. **Wessinger**. There should be a recall procedure or adequate followup in such a way you know all that material has been removed from the market.

Mr. **Horton**. Thank you, Mr. Chairman.

Mr. **Barnard**. Mr. Mrazek.

Mr. **Mrazek**. Thank you, Mr. Chairman.

I am a little confused as to who we ought to be relying on for certain types of tests, which can confirm the wholesomeness of the products we would be consuming in this country. I am curious in particular about how it would be possible that the July 12, 1985, document, which determines minimal levels for potential risk to health, would not be utilized in trying to make a determination on which products represent a danger to public health.

We know that that memo was sent. You confirm it, in fact, was received. Yet, that following December a lot of attention was paid to urging the recall of wines which had 6 to 10 parts per million, approximately, of contamination with DEG while other products with 19,000 parts per million were not addressed with the same kind of diligence.

I am curious to know why you think that was, in fact, the case?

Mr. **Domenick**. It seems to me that by taking the position that any amount whatsoever causes this to be adulterated and requiring it to be taken off the market, BATF was put in the situation of dealing with an awful lot of wines and an awful lot of work to assure that all the right actions were taken.

If there was an amount that could be identified as a trigger amount, that says below this amount we can live with the risk; above that amount, we cannot. It would have allowed the focusing of the effort on those wines that presented the greatest risk.

Mr. **Mrazek**. We have seen some preliminary studies that suggest you can, in fact, quantify at least to a certain extent the potential risk; and I would assume, therefore, you are suggesting that one positive direction we might pursue in the way of new regulations is to set some type of gradient for contamination by this DEG problem or other contaminants.

Mr. **Domenick**. Yes. Deciding on the number involves an awful lot of judgment and educated guesswork. There is no scientific proof that says this is the number, beyond the shadow of a doubt. There are certain scientific judgments that have to be made. I would liken it to the situation with FDA and food and the setting of action levels for pesticides. A decision is made that says so much of it we can live with; beyond that amount, we need to act and remove from the market.

It seems to me the wine situation is very similar to that. Whatever the contaminant might be, a decision needs to be made how much of it represented a risk that we can live with and at what level does it pose a risk that we need to act to ensure that is taken off the market.

Mr. MRAZEK. To what extent were some of these problems caused by a lack of staff or resources on the part of the BATF?

Mr. DOMENICK. I am sure resources were a factor in all of this. I think perhaps that—in hindsight——

Mr. MRAZEK. There has been certain criticism of the lack of a master list being presented to the regional agencies, those kinds of things.

Does that stem, in your view, from a combination of problems including lack of adequate staff, or is it a management problem?

Mr. DOMENICK. I think there are things that could have been done in a way that would have reduced the burden that resources would play in this whole thing. If one had proceeded a little differently, the level of resources necessary to follow up and assure certain things happen could have been better targeted, and thus the resource problem could have been minimized.

By approaching everything as a problem, it requires many more resources to follow up and make assurances that certain testing got done, that certain wines were taken from the market.

Mr. MRAZEK. Have you been in a position to look at the whole question of unauthorized ingredients in both domestic and foreign wines? Or have you only looked specifically to these?

Mr. DOMENICK. We were specifically asked to address the question of the DEG-contamination issue. That was primarily our focus there. We are doing a larger job for Congressman Horton where we are looking at FDA's monitoring of imported food for pesticide residues.

Mr. MRAZEK. I wonder if that could conceivably be expanded? I know I read a recent Wall Street Journal article which suggested there are certain domestic wines where fish glue is utilized as a clearing agent and other wineries utilize hydrogen peroxide to bleach red grapes to make white wine.

I personally don't know if it represents a serious problem or not. You know, in the final analysis, I guess I have no discrimination against domestic or foreign wine. I enjoy a variety of both domestic and foreign-produced wines. I haven't noticed any significant health problems internally up to this point, but perhaps it would be worthwhile to take a good look at the whole range of unauthorized ingredients in wines and come up with some general standards.

Mr. HORTON. Would the gentleman yield on that? We have witnesses that are going to testify later. They will testify, I think, to requirements and restrictions we have with regard to American wine. I think that is important in this hearing to establish the standards that the local—the American industry is held to and the type of things you are talking about, they would not be permitted to put those wines on the market.

Mr. **Mrazek**. Well, I am sure the Wall Street Journal has something to learn, as well as the rest of us up here on the panel.

Thank you very much, Mr. Chairman.

[The Wall Street Journal article referred to follows:]

Wall Street Journal, April 16, 1986, page 35

What's in Wine? More Than You Might Imagine

By Trish Hall

Staff Reporter of The Wall Street Journal

Although the Italian wine makers who added toxic substances to their product were, at the least, reckless, in one sense they weren't doing anything unusual. Wine makers the world over put many additives into their products.

The U.S. government, for example, allows wine makers to use about 80 additives that are considered safe for the population at large. Many of these don't show up in the final product, but some remain, and some of these may provoke reactions in allergic people.

For years, the Center for Science in the Public Interest has been pressing the government to require that ingredients remaining in the beverage be listed on the labels. A court decision could settle the issue by fall. The wine industry has opposed that rule but now appears ready to accept a newly proposed regulation calling for labeling of wines containing sulfites.

U.S. wine makers can legally use chemicals that help in fermenting and clarifying wine and in stabilizing its color and taste. Some of the most commonly used additives are sulfiting agents and sorbates, which are preservatives, and egg whites or fish glue, which clear the wine.

Many People Affected

"All of these have been shown to cause allergic reactions," says Bruce Silverglade, legal director at the Center for Science. He cites a 1980 government estimate that up to 1.7 million people are allergic to some of the ingredients used to make alcoholic beverages.

The Wine Institute, a trade group, argues that a general labeling requirement would cost the U.S. industry $45 million a year and that there isn't a health hazard. John DeLuca, its president, says filtering agents such as egg whites appear in finished wine in only minute amounts. These don't threaten allergic people, he says: "At worst you would get discomfort."

He adds, though, that sulfites could be an exception. The industry will probably support sulfite-labeling regulations, he says, because its own research shows that as many as 5,000 asthmatics may be sensitive to the chemical.

In addition to the additives that concern Mr. Silverglade, many others are used in wine making. Gum arabic, common as a food additive, is used as a stabilizer. Wine makers also use citric acid, tartaric acid or malic acid to remedy imbalances and improve taste. Sugar is permitted as an additive in Europe, but not in California, which produces most U.S. wine.

Oak Flavor

Some wineries try to keep prices low by adding a chemical to impart an oak flavor instead of aging the wine in costly oak barrels. Some additives are used for ease of processing; some wineries, for instance, use defoaming agents such as silicon dioxide to prevent vats from overflowing when grapes are crushed.

In addition, Mr. Silverglade says, some wineries use hydrogen peroxide to bleach red grapes so they can use them to make white wine. Although there's no health hazard, he says it's a "rip-off" of consumers and he believes they ought to know such processes are used.

"The industry fears the marketplace reaction when consumers find out certain brands have additives and certain other brands are natural," he adds.

The fight over labeling has been going on for years. The Carter administration proposed a rule requiring labeling, but the Reagan administration rescinded it before it took effect. Last fall, a federal court ruled that the Treasury Department, whose Bureau of Alcohol, Tobacco and Firearms regulates the industry, couldn't rescind the rule.

The Treasury Department is appealing that decision to the U.S. Appeals Court in Washington, which is expected to hear arguments May 23 and to rule by the end of summer. If it upholds the decision, consumers may see ingredient labels on alcoholic beverages next year.

The requirements are weak compared with standards imposed on the food industry. Wineries could either list the primary ingredients or provide an address where consumers could obtain a list in 30 days.

Paul Draper, wine maker and partner at Ridge Vineyards, Cupertino, Calif., fears that the requirement would give imported wines an advantage because the U.S. government couldn't check the accuracy of foreign labels. "American industry will be at a further disadvantage and the consumer will learn nothing from their labels," he says.

But not all wine makers oppose labeling. Walter S. Taylor, owner of Bully Hill Vineyards in Hammondsport, N.Y., discloses ingredients on his labels and believes all vintners should. "Any winery in the world can add all this stuff to it and call it pure and natural. It's a complete deception," he says.

Mr. **Barnard**. Do you have any further questions, Mr. Horton?

Mr. **Horton**. No.

Mr. **Barnard**. Mr. Erdreich?

Mr. **Erdreich**. No.

Mr. **Horton**. I would like to join you in thanking the GAO. I know this report took a lot of time. I would like to commend you and your staff, Mr. Wessinger, for the report you made.

Mr. **Barnard**. One final question, Mr. Wessinger.

If there had been no notice to this country by Canada, as there was no alerting to us by the Austrians, your findings are that there is no process in place that would have detected the DEG levels in imported wine?

Mr. **Wessinger**. Unfortunately, I think that is the case, Mr. Barnard. As you know, we point out in our report there were indications DEG may have been in wines as early as 1979.

Mr. **Barnard**. What about methanol? The same is true as far as methanol is concerned?

Mr. **Wessinger**. I think it possibly could be true there. Until such time as someone becomes ill over the substance——

Mr. **Donohue**. I would like to expand on that a little bit. According to BATF, they test for alcohol content. Certain of the tests, according to their spokesman, would have picked it up earlier if it had been in those wines tested.

The big question there is: Would they have tested the right wines? Had they tested a wine with methanol, they would have picked it up. There is a certain level above which methanol is viewed as a violation.

Mr. **Horton**. Mr. Chairman, I do have one more question to ask.

You will recall the sequence: The GAO report was finished, I think, March 4. I had 30 days before releasing it. It was released shortly after that. Just coincidentally, I set the press conference for releasing it, and then a day or two before that press conference, the Italian wine story broke.

How did BATF's response to the methanol-contaminated Italian wines compare to and differ from the procedures and policies it followed for the DEG-contaminated wine?

Mr. **Donohue**. The action they took there was somewhat similar with the Austrian wine. They stopped all imports, had everything tested, and they sent out notices.

They took better action on the methanol than they did over the German and Italian wines with the DEG.

What the problem we see is that they should have defined what the universe is; they should have concentrated their efforts on the Italian importers, like we pointed out in Mr. Wessinger's testimony.

It only took one of our staff 3 hours to determine which importers and which wines were Austrian involved in the DEG case. With the Italians, there would have been more, because a larger quantity was involved. Had they concentrated on that, we think they would have done a better job. However, they took better action than they previously had taken.

Mr. **Horton**. Thank you.

Mr. **Barnard**. Thank you all for being with us today. I would like to request that, if possible, you stay in the audience for the remainder of the testimony, because there may be some followup questions that we will need to ask after the testimony from the BATF and FDA. Thank you.

Our next witness this afternoon will be William T. Drake, Deputy Director of the Bureau of Alcohol, Tobacco and Firearms. We would be delighted to have your associates join you, Mr. Drake.

STATEMENT OF WILLIAM T. DRAKE, DEPUTY DIRECTOR, BUREAU OF ALCOHOL, TOBACCO AND FIREARMS, DEPARTMENT OF THE TREASURY, ACCOMPANIED BY JOHN MANFREDA, CHIEF COUNSEL, ALCOHOL AND TOBACCO, AND BRUCE WEININGER, CHIEF, INDUSTRY COMPLIANCE DIVISION

Mr. **Drake**. With me is John Manfreda, chief counsel, Alcohol and Tobacco; and on my left, Bruce Weininger, chief of the Industry Compliance Division.

Mr. **Barnard**. Mr. Drake, without objection your entire testimony will be included in the record. If you care to summarize, that will be fine. We leave that up to you.

Mr. **Drake**. I would like to summarize, Mr. Chairman.

I welcome the subcommittee's invitation to discuss the role of the Bureau of Alcohol, Tobacco and Firearms in dealing with diethylene glycol-contaminated imported wines.

The subcommittee has copies of my testimony for the record, which includes a chronology of events and actions taken by ATF to meet the problems created by the discovery of diethylene glycol in certain imported wines.

I would like to take the next few moments to highlight the main issues, and to give this committee an insight into our thinking processes and why we acted as we did.

First, no one will be any tougher on second-guessing our decisions and actions than we at ATF. During the past 6 months, I, along with my staff, have held repeated brain-storming sessions over each step of our entire operation as it related to diethylene glycol.

It is fair to say that given the same set of circumstances, the same timeframe and the same resources, we would make those same decisions again.

Perhaps we did not keep detailed records, and perhaps this lack of perfection in recordkeeping has led to some of the misunderstandings which seem to have arisen.

I believe, however, that the key to a successful operation is not in leaving a long, detailed paper trail, but in keeping one's priorities straight.

I am extremely proud of my staff and their work in this situation. With no complaints, they worked long, tough hours and weekends for several weeks because there was a job to be done. Moreover, I know our priorities were right on target.

We were faced with an immediate problem in which we had to act quickly. Our first priority was to get the contaminated wines off the shelves because they posed a potential threat to the health and safety of the American consumer.

To my knowledge, there has not been one confirmed report of any death or illness in the United States resulting from the DEG-contaminated wines. To the extent that one can judge from final results, I believe we succeeded in protecting the consumer.

When we first learned that a scandal was brewing in the Austrian wine industry concerning DEG, we took two immediate steps: We contacted the Austrian and German Governments for information on bottlers, producers and brand names of the contaminated wines; and we immediately started testing for DEG in not only Austrian wines but a number of other imported and American wines.

We also contacted the Food and Drug Administration who told us that DEG at high levels posed a more immediate health threat, but there could be a cumulative effect on the kidney and liver at relatively low levels. The best scientific information we had available reflects that there is no tolerable level for DEG.

This led us to what I believe is the only rational conclusion: That the presence of any amount of DEG in wine posed a potential health threat. Every decision made, and every step taken flowed from our basic priority of protecting the American consumer.

It has been stated publicly that ATF was not able to assure that every contaminated bottle of wine was removed from sale. Even unlimited staff and resources could not have given that assurance.

There is no practical way to guarantee that all of any contaminated product is removed from the shelves of all of the millions of stores in the country.

We identified 250 importers who had approved labels for importing Austrian wine, and gave that information to our regional offices, who in turn notified the importers We believed, and still believe, that the important issue was to get the contaminated wine off the shelves as soon as possible.

We made a decision that it was faster, more efficient and more cost-effective to concentrate on the 250 known importers rather than to contact each one of the more than 12,000 wholesalers and importers who might at one time or another have sold imported Austrian wine. By identifying all importers of Austrian wines, we were certain that we would impact every Austrian wine on the market.

We did not rely solely on our own testing, or that of the wholesalers and importers to get the message across. We have excellent cooperative relationships with the State liquor boards across the country. As we determined which brands were contaminated, each of the 18 control States were informed and took appropriate action to pull the wines from the shelves. We also kept in constant contact with the noncontrol States who worked closely with us in removing the wines from the retail outlets.

Between July 18, 1985, and April 29, 1986, we issued a series of 15 press releases listing the wines as labeled, warning the public against drinking the wines and suggesting they either return the wines to the retailer or dispose of them. The releases generated a substantial amount of press coverage which resulted in, by a conservative estimate, over 4,000 calls from the press and the public.

There were 74 ATF-diethylene glycol stories carried on the AP and UPI wires, the Washington Post, the New York Times, and five other major newspapers, in addition to hundreds of additional stories carried by local press, TV and radio.

There has been some concern expressed that we did not "properly differentiate" between wines containing "high" levels of DEG and those which contained "lower" or "trace" amounts, and that we did not "properly allocate" our resources to react to these different levels.

From the very beginning, based on the knowledge we had available, DEG was identified as a toxic chemical, and was not acceptable at any level as an additive to any product intended for human consumption.

Based on that information, any level of DEG found in Austrian wine was totally and equally unacceptable, and our reaction to its discovery was swift and consistent.

In addition, it should be recognized that during this period we did not know the size of the universe of contamination. We did not know whether we would find 1 or 1,000 different brands of contaminated wines. We did not know how many brands, 1 or 1,000, we would find that could be considered high.

In other words, we made judgments and decisions based on the information we had available at that exact time. We did not have the luxury that hindsight allows in analyzing judgments and decisions from a historical perspective.

The last issue I would like to address is ATF's followup action to verify that the contaminated wine had been removed from the market. It is true that we did not check each and every importer and wholesaler. Those actions would have required immense resources that are not at our disposal. We did monitor the recalls. We did hundreds of onsite inspections. We did receive daily reports that flowed into headquarters from our regional and field offices who were on the scene, every day.

One additional note: All of the brainstorming and second-guessing of our own actions during the diethylene glycol problem led us to take almost identical steps during the more recent methanol situation. Apart from fine-tuning some of the operational steps and, of course, apart from making certain this time that we do have a readily available and detailed paper trail, we have taken basically the same steps with the potentially far more dangerous problem of methanol. If you were to ask me, would we do it again, we most certainly would.

I am proud of our staff and gratified by the tremendous support of the Food and Drug Administration and numerous State agencies in this successful consumer protection initiative.

Do we have enough resources? Are the laws which we enforce perfect? I suspect that you gentlemen have your own thoughts on these subjects. At the bottom line, however, I believe that we have a consumer protection system that is fundamentally sound.

I will be happy to answer any questions you may have.

[The prepared statement of Mr. Drake follows:]

Commerce, Consumer and Monetary Affairs Subcommittee
of the
Committee on Government Operations

Testimony
by William T. Drake
Deputy Director
Bureau of Alcohol, Tobacco and Firearms
Department of Treasury
May 28, 1986

WRITTEN TESTIMONY
CONTAMINATED IMPORTED WINES

I welcome the subcommittee's invitation to discuss the role of the Bureau of Alcohol, Tobacco and Firearms in dealing with diethylene glycol-contaminated imported wines.

In the interest of clarity, we have responded to your questions in the order raised in your request of April 23, 1986.

A. BATF's Authority Over Contaminated Wine and the Exercise of That Authority

1. a. Please describe BATF's regulatory authority over contaminated wine. If BATF's authority derives from the "mislabeling" provisions, specify the violations arising from (i) DEG contaminated wines and (ii) methanol contaminated wines, and indicate what labeling changes would cure those violations.

ATF The Bureau of Alcohol, Tobacco and Firearms (ATF) derives its legal authority over contaminated wines, both domestic and imported, from the Internal Revenue Code of 1954 (IRC) and from the Federal Alcohol Administration Act (FAA Act), 27 U.S.C. §§ 201, _et seq._). Specifically, Chapter 51 of the IRC vests in ATF the authority to promulgate regulations concerning the imposition and collection of tax on domestic and foreign wines (26 U.S.C. §§ 5041-5045), and further provides for the authority to promulgate regulations with respect to the establishment and operation of premises for the production, treatment, storage, bottling and packaging of wine (26 U.S.C. §§ 5351-5373), as well as regulations concerning the actual processing and treatment of wines. (26 U.S.C. §§ 5381-5388.)

With respect to domestic wines, ATF's regulations under the IRC control what materials and processes are authorized for the treatment of wine. 27 C.F.R. §§ 240.1051 and 240.1051b. Only materials that have been approved for use by the Food and Drug Administration (FDA) may be used in the production of domestic wines. However, these regulations pertaining to authorized materials and processes on domestic wine cellar premises do not specifically apply to foreign producers since the IRC has no extraterritorial jurisdiction. This is not to imply that a foreign wine which is an adulterated food product could be released from Customs custody.

The IRC also vests authority in ATF to detain any container that will be removed in violation of law. 26 U.S.C. § 5311. This provision applies to both domestic and imported wines.

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By way of contrast, the labeling provisions of the FAA Act apply to both domestic and imported wines. Pursuant to the provisions of section 5(e) of the FAA Act (27 U.S.C § 205(e)), ATF is vested with the authority to promulgate regulations regarding the labeling and advertising of alcoholic beverages, and to provide the consumer with adequate information concerning the identity and quality of such products. Section 5(e) also provides, in part, that it is unlawful for any person engaged in business, inter alia, as an importer or wholesaler to sell, ship, or deliver for sale or shipment in interstate or foreign commerce, or to receive therein, or to remove from Customs custody for consumption, any alcoholic beverages unless such products are bottled, packaged, and labeled in conformity with Bureau regulations.

In order to prevent the sale or shipment in interstate or foreign commerce of alcoholic beverages that may be bottled, packaged, or labeled in violation of the FAA Act, section 5(e) provides that no person shall remove bottles from a bonded winery premises or Customs custody unless a certificate of label approval is obtained from ATF covering the alcoholic beverage. Customs officers are authorized under this section to withhold the release of a wine product.

Furthermore, section 4(e) of the FAA Act (27 U.S.C. § 204(e)), expressly provides that the importers' and wholesalers' basic permits are conditioned upon compliance with, inter alia, the labeling provisions in section 5(e). Additionally, section 7 of the FAA Act (27 U.S.C. § 207) authorizes ATF to seek an injunction against a permittee to prevent the removal of products that are adulterated and further provides a misdemeanor penalty for any person violating the labeling provisions of the FAA Act.

With this statutory and regulatory background, we turn to a discussion of the FAA Act regulations as they pertain to wines containing diethylene glycol (DEG) and methanol.

Briefly, wines containing DEG are mislabeled in violation of the FAA Act when they bear a designation which can only be used for grape wines. 27 C.F.R. § 4.21(h)(1)(i). In a similar vein, ATF would not issue label approvals for grape wines containing unauthorized levels of methanol since these wines would not conform to the standard of identity for grape wines as prescribed in 27 C.F.R. § 4.21(a).

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The Bureau takes the position that in the case of a wine containing a contaminate which creates a health hazard, no labeling changes would cure these violations. ATF would not allow the product to be labeled as a wine pursuant to the FAA Act. Furthermore, any domestic or imported wine containing such a material would not be allowed entry into the United States market.

Finally, the FAA Act does not directly cover the adulteration of alcoholic beverages. While the Act does refer to "quality," it has never been interpreted as vesting in ATF the authority to determine what ingredients are safe for use in domestic or foreign alcoholic beverages. Jurisdiction over the adulteration of food products, such as alcoholic beverages, is vested in the FDA pursuant to the Federal Food, Drug and Cosmetic Act of 1938. See 21 U.S.C. § 342a. ATF has always consulted with the FDA to determine if a particular additive in a wine results in the product being considered adulterated.

1. b. Prior to a determination that suspect wines are contaminated, does BATF have authority to require each of the following actions and impose sanctions for refusals to implement them: (1) requiring importers and wholesalers to disclose to BATF the names of distributors and retail customers carrying the suspect wines; (2) requiring importers and wholesalers to test wines on their own; (3) requiring importers and wholesalers to contact retail customers to (i) obtain wine samples or (ii) remove suspect wines; (4) requiring retailers to test suspect wines on their own or to remove them; and (5) requiring submission of reports from importers, wholesalers, and retailers on any of these testing or removal efforts? Can it require submission of such reports from any of these three categories of entities after BATF determines contamination?

ATF 1. Importers and wholesalers may be required to submit the names of distributors and retail customers carrying wines that are contaminated or suspected of being contaminated pursuant to 27 U.S.C. § 202(d), which authorizes the Director to require "such reports as are necessary to carry out (his) powers and duties" under the FAA Act. Willful failure to provide this information could result in a revocation or suspension of the importer's or wholesaler's basic permit pursuant to section 4 of the FAA Act.

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2. ATF has the authority, pursuant to 27 C.F.R. § 4.38(h), to require that importers test wine products to ensure that the wine is not mislabeled both prior to and after a determination that a suspect wine is contaminated. Section 4.38(h) states that "upon the request of the Director, there shall be submitted a full and accurate statement of the contents of the containers to which labels are to be or have been affixed." Willful failure by the importer to test wines pursuant to ATF's request could result in revocation or suspension of their basic permit or result in a misdemeanor penalty under section 7 of the FAA Act.

Wholesalers, as well as importers, may be required to test imported wines pursuant to 27 U.S.C. § 202(d), which authorizes the Director to require "such reports as are necessary to carry out [his] powers and duties" under the FAA Act. Willful failure to test wines could result in a revocation or suspension of the wholesaler's and importer's basic permit.

3. ATF has no authority under the IRC or FAA Act to require that importers and wholesalers (i) obtain wine samples or (ii) remove suspect wines from retail premises either prior to or after a determination of contamination. ATF has no recall authority under either the IRC or the FAA Act. ATF would rely on the voluntary compliance of importers and wholesalers to conduct such sampling and removal procedures.

4. ATF has no jurisdiction under the IRC or FAA Act with respect to requiring retailers to test suspect wines either prior to or after a determination of contamination.

5. Under the authority described in subparagraph (2), ATF may require importers and wholesalers to submit reports of wine testing to ATF both prior to and after a determination of contamination. Willful failure of an importer to comply could result in a revocation or suspension of the basic permit or in a misdemeanor penalty. A wholesaler's willful failure to submit test results could result in a revocation or suspension of the basic permit. ATF has no authority to require that retailers submit such reports as stated in subparagraph (4). As stated in subparagraphs (3) and (4), ATF has no authority to require importers, wholesalers, or retailers to submit reports on removals of wine from the retail level.

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1. c. Does BATF need additional legislative authority or clarification of its existing authority? If so please elaborate.

ATF With respect to your question regarding the need for additional legislative authority, ATF views this issue as a complex one involving two Federal agencies. ATF is presently studying this issue and subsequent to discussions with FDA will take appropriate action.

2. Please describe each instance prior to July 1985 (the DEG situation) in which BATF has exercised its regulatory authority over domestic or imported contaminated wines.

ATF Prior to July 1985, ATF has not had to exercise its authority (mislabeling) over domestic or imported contaminated wines.

3. The GAO found that BATF presently does not routinely test any samples of imported wines for contaminants other than DEG (and now methanol). Why not?

ATF ATF does not routinely test wine for the presence of contaminants. To our knowledge, and consistent with FDA advice on this matter, there is no one chemical test known to science which can be utilized to detect all possible contaminants which might be in a wine. Since our laboratories must know what ingredient they are testing for before deciding on the proper test to run, we would not routinely test for DEG in wine as it was previously inconceivable that anyone would purposely use DEG in winemaking.

However, while we may not "routinely" test for the presence of "generic" contaminants, when we receive intelligence, rumors, information or allegations of potential contaminants, i.e., afla-toxin, glass, pesticides, methanol, we do initiate an immediate sampling/testing program to determine whether there is a problem. But again, one must know the "specific" contaminant to test for before a proper test can be performed.

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B. BATF's Methods of Identifying and Verifying DEG Contaminated Wines

The GAO report criticizes BATF's lack of information in identifying DEG contaminated wines, particularly those imported prior to July 1985, and concluded that, "The extent to which BATF was successful in getting all Austrian wines tested for DEG is unknown because BATF did not identify which importers and wholesalers sold and distributed Austrian wines, nor did it identify which Austrian wines were currently being marketed in the United States." Please respond to GAO's assertions. In your answer, please respond to the following questions:

1. Foreign government communications: At any time, did BATF receive and review any lists of adulterated Austrian wines, provided by the Austrian Government, including the 9/26/85 list forwarded from the United States Embassy in Vienna through the USDA? If so, identify the lists received by BATF and indicate how BATF used them. Provide similar information on any such lists of contaminated German or Italian wines.

2. BATF attempts to have importers and wholesalers test Austrian or other wines for DEG

   a. BATF produced a computer list of approved Austrian wine labels together with vendor (importer) number. Since this information was in the computer, why did BATF not devise a method for obtaining a master list of importers, using vendor numbers? How much time and effort would have been required to review the computer printout to amass each vendor's number after the industry-wide alert was sent?

   b. In view of the small number of importers submitting test samples or test reports, what systematic efforts did BATF undertake, if any, to find Austrian wines which had not been tested or sent to BATF for testing?

   If BATF relied on regional and field offices to conduct inspections or to make telephone contact, (i) describe BATF's system and its sampling selection, and (ii) indicate the number of field inspections conducted and the number of untested wines discovered. (Answer these questions only in the context of testing wines, not removing wines already tested and known to be contaminated.)

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c. How did these procedures differ for the Italian and German wines?

ATF In response to GAO's assertion, ATF did identify from its records the importers who had obtained certificates of label approval for Austrian wines as well as all Austrian wines for which label approval had been issued.

After learning of the possible contamination of Austrian wines with DEG, we contacted the Austrian and German Governments to ascertain the names of the producers, bottlers and brands of wines they found to be adulterated. At first, we were told by the Austrian and German Governments that the contaminated wines were positively not exported to the United States. Based on the limited information available and because of the need to act quickly due to the potential health threat, we identified, through our computerized index of Certificates of Label Approvals 1800 labels approved for white, red and rose Austrian wines. In this manner, we were able to identify approximately 250 importers who held label approvals for Austrian wines.

This information was immediately passed along to all BATF Regional Directors (Compliance). The Regional Directors were directed to notify identified importers of Austrian wine of the reported problem with Austrian wines.

Identification of each specific wholesaler who handled Austrian wines and of Austrian wines currently being marketed in the United States was not deemed feasible because it would have entailed an exhaustive analysis and examination of importers records, well beyond the time frame we deemed critical to identify the handlers of Austrian wines as well as those Austrian wines currently being marketed. This process would have been extensive since thousands of wholesalers at one time or another could have handled Austrian wines. Given the critical time frames involved, we utilized the most efficient methods available to us to ensure the identification of contaminated Austrian wines.

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After issuing the Industry Memorandum informing industry members of the potential health risk associated with consuming DEG contaminated wines, informing industry of the certification and testing procedures being implemented for DEG prior to entry into the United States, and requesting industry to test and withhold all Austrian wines from sale pending verification that such winesdo not contain DEG, we utilized lists of contaminated wines presented to us by foreign sources to conduct label searches for specific brands in the United States. If a similar brand was found to have label approval for entry and distribution, we notified our field offices to contact the importer of record to ascertain if a specific brand was available for testing. This procedure was also implemented for German, Italian, Hungarian, and New Zealand wines each time we were presented with specific brand names from any foreign source.

We also conducted approximately 200 field inspections to randomly sample at the retail level wines for DEG contamination and informed the public, through the media, that we would test wines purchased by consumers for DEG contamination. Through these efforts, we discovered 75 additional Austrian, German and Italian wines adulterated with DEG.

With respect to your inquiry in question 1 concerning foreign government communications, the German and Austrian Embassies began providing us with lists of wines found to be contaminated in each respective country in late July 1985. We utilized these lists in conducting label searches for specific brands. If a similar brand was found to have approval for entry and distribution in the United States, we notified our field offices to contact the importer of record to ascertain if the specific brands were available for testing, if this wine had been previously tested, and when and how much was imported. This procedure was utilized each time we were presented with specific brand names from any foreign source.

The following lists of adulterated wines were received and reviewed by ATF.

7/25/85	Received a German list of Austrian wines.
7/30/85	Received an Austrian list of Austrian wines.
8/1/85	Received a German list of German wines.
8/2/85	Received a German list of German wines.
8/7/85	Received a German list of German wines and a list of Austrian wines.

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8/9/85	Received a German list of German wines.
8/13/85	Received an Austrian list of Austrian wines.
8/14/85	Received a German list of German wines.
8/16/85	Received a German list of German and Austrian wines.
8/26/85	Received a German list of German wines.
8/27/85	Received an Austrian list of Hungarian wines.
8/29/85	Received a German list of German wines.
9/12/85	Received a German list of all German and Austrian wines found in West Germany.
9/20/85	Received an Austrian list of Austrian wines.
10/15/85	Received a German list of adulterated wines.
10/31/85	Received a German list of Austrian, German, Hungarian, Italian and New Zealand wines.
12/3/85	Received an Austrian list of adulterated wines.
1/7/86	Received a German list of Austrian, German and other countries wines.
1/22/86	Received a German list of adulterated wines.

The list from the United States Embassy in Vienna was received and reviewed by us and is identical to the 9/20/85 list provided to us directly by the Austrian Government. We did not receive any lists of wines from the Italian Government.

In response to question 2a, ATF did not compile a master list of importers using vendor numbers since such a compilation would be a duplication of effort. ATF's computerized index of Certificates of Label Approval also identifies importers by basic permit number which is assigned by ATF's regional offices.

In response to question 2b, ATF did not institute a system of follow up to determine why only a small number of importers submitted test samples and test results to ATF. However, we were aware that in July 1985, all Austrian wines in Customs custody were being tested by us.

Furthermore, since neither importers nor wholesalers are specifically required to obtain test samples from retail distributors or to remove products from the retail level, and since any review of a permitees invoice and credit records to ascertain the chain of distribution of Austrain wines would be a time-consuming task, we chose a more expedient method. As previously indicated, our regional offices conducted approximately 200 field inspections at retail premises to sample wines for DEG contamination. We also notified the public, through the media, that ATF would test wines which had been purchased by consumers. By utilizing these methods, ATF was able to quickly discover 75 additional Austrian, German, and Italian wines contaminated with DEG.

In response to question 2c, we utilized the same procedures to find German and Italian wines in the market place as we did Austrian wines.

C. BATF's Actions in Removing All DEG Contaminated Wines From the Market

1. Lack of a master list of contaminated wines: Fourteen BATF press releases--each indicating different contaminated wines--were the only source of information for both the public and BATF staff. Moreover, no master list of contaminated wines was prepared until late December 1985, and then only in response to GAO's request. Why did BATF not compile a master list for both the public and its regional and field offices, supplementing it as new wines were found to be contaminated.

ATF GAO's assertion that no master list of contaminated wines was prepared until late December 1985 and then only in response to their request is erroneous. A master list of contaminated wines was first prepared on 7/18/85 and supplemented as new wines were found to be contaminated. These list were transmitted to our regional offices to be used in disseminating information to field offices as well as the public. Furthermore, press releases were made available to regional and field offices to enable them to furnish copies of singular press releases or all press releases to consumers upon request.

2. BATF's failure to routinely observe, review, or verify importer and wholesaler removal activities: The GAO found that BATF relied on importers and wholesalers to remove contaminated wines, that BATF did not routinely observe, review, or verify importers' and wholesalers' actions in doing so, and that, consequently, BATF does not know the extent to which all contaminated, particularly Austrian, wines were removed from the market.

a. Explain fully BATF's failure to systematically follow-up contacts with all of the known importers of contaminated wines and to contact wholesalers to monitor their actions. How many importers and

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ATF wholesalers of (i) Austrian, (ii) German, and (iii) Italian wines would have been involved. (According to GAO, there were 12 importers of Austrian wines.)

ATF did involve the importers and wholesalers in assisting us in removing contaminated wines from the market. While we did not observe each and every bottle of wine recalled by each and every importer and wholesaler, we have monitored the recall and have tracked it through hundreds of on-site inspections and daily reports from regional and field offices documenting our follow up efforts.

The joint effort of industry and government in testing and removing contaminated wines from the market place was based on judgments which considered such things as the magnitude of the problem, the need, we felt, for quick, decisive and responsive action, the resources available to the Government, and the long history and experience of reliability and responsibility of the industry we regulate. At the time of the GAO inquiry, there were 13 importers of Austrian wines, 4 importers of German wines and 7 importers of Italian wines involved in importing contaminated wines. Identification of each wholesaler who handled these wines was not accomplished nor deemed feasible because it would have entailed an exhaustive analysis and examination of importers records. This process would have been extensive since thousands of wholesalers at one time or another could have handled these wines.

b. Why did BATF not require each such importer and wholesaler to file a report setting forth its actions in removing contaminated wine, the amounts of such wine, the names of retailers, etc., to assure accountability and to enable limited inspector verifications?

ATF ATF does not have the legal authority to require each importer and wholesaler to file a report setting forth its recall action.

4. Inspector verification through spot checks on retailer shelves: How may retail establishments nationwide did BATF inspectors visit to determine if contaminated wines were being sold, and how were these retail establishments selected? What did the inspector's find in the way of contaminated wines (by types and numbers of wines and numbers of establishments)?

Contaminated Imported Wines

ATF Our inspectors have visited thousands of retail establishments nationwide to determine if contaminated wines were being sold. These establishments were selected randomly in those cities selected for follow-up by regional offices. Presently, given the time constraints of your request, we have not had an opportunity to compile exact figures of the retail establishments visited and the amount of contaminated wine (by types and numbers of wines) found on shelves.

D. BATF's Failure to Determine the Level of DEG in Wine Posing Significant Risks to Health and its Failure to Focus Removal Efforts on Wines With High DEG Levels

1. Lack of risk assessment:

a. Did BATF attempt to seek a risk assessment from FDA to determine what amount of DEG in wine would represent a significant risk to health? If so, what was FDA's response?

ATF FDA was contacted in July 1985 concerning the health risk associated with DEG and they provided us with internal FDA information which discussed previous experiences with DEG. The information was compiled by FDA toxicologists and provided to us by FDA's Division of Regulatory Guidance. The information we received from FDA indicated that DEG is dangerously toxic at high levels and is not allowed at any level for direct addition to products intended for human consumption.

b. Why did BATF not conduct its own independent risk assessment to determine which levels of DEG would represent significant risk to health? Explain fully.

ATF We did not determine the amount of DEG that would pose a significant health risk because we are not "health" experts. We do not have the background, expertise or authority to determine health risks and therefore we relied on FDA for such determinations, as noted in our previous response.

2. Lack of special attention to wines contaminated with DEG in higher amounts:

a. Notwithstanding the lack of an "official" risk assessment, the scientific evidence furnished by FDA to BATF (and then to GAO) clearly indicates that levels of continued DEG ingestion at or above 6 grams per day can have long-term side effects. There were only five wines--all Austrian--found to have 6 grams or more of DEG per liter, involving either four or five importers.

Contaminated Imported Wines

(One of the wines had 19.7 g/l of DEG and another had 16 g/l.) Fully explain BATF's failure to treat those five wines differently as a group from the others, such as contacting and warning wholesalers and retailers carrying these wines, to monitor their removal.

ATF As we stated in question D.1.a., we were advised by FDA that according to law DEG was not acceptable in wine at any level. Therefore, irrespective of the level of DEG contained in the product, ATF regarded all such products as adulterated. Accordingly, these products had the same removal priority. Although we did not specifically contact wholesalers and retailers carrying these wines in person, by alerting the importers to the contamination, requesting them to effect a recall, alerting state alcoholic beverage agencies to the problem, conducting on-site inspections to verify that such products were not being sold, and issuing press releases to the public, ensured removal of the adulterated wines from the market. We would also point out that at the time of GAO's inquiry the universe of affected wines was known. However, when ATF was in the midst of this problem, there was absolutely no way of knowing just how many more products would be involved (Hindsight is everything!) Accordingly, a broader warning system was clearly more advantageous than any attempt at using ATF's available resources to deal with this problem on an isolated scale.

b. There were an additional 30 Austrian wines (no German or Italian wines) with DEG levels of 1 gram to 6 grams per liter, involving 12 importers. Why were these wines not given a second priority, and treated differently from all of the remaining wines containing less than 1 gram per liter, as suggested above?

ATF See response to question D.2.b

c. Why did BATF fail to share the information of DEG levels correlated to contaminated wines with its regional and field staff, relying instead on the press releases, to enable them to give these wines special attention?

ATF We did not provide regional and field staff with DEG levels because our main purpose was in informing them of the specific brands found to be contaminated not the specific levels found. Moreover, providing them with specific levels found would not aid them in identifying those wines adulterated with DEG.

Contaminated Imported Wines

E. Gaps and Inconsistencies in BATF Recordkeeping

The GAO found that, "Numerous gaps and inconsistencies in BATF's recordkeeping prevented us from fully verifying many BATF actions." (P. 16 of the report.) Please respond to this finding; indicate how BATF Headquarters can monitor systematically the testing and removal of contaminated wines without better records; and indicate what BATF is prepared to do to remedy any problems.

ATF As we explained to GAO, ATF's actions were initiated after weighing the need for having a proper paper trail versus the more important concern of protecting the consumer from a possible health hazard. We firmly believe, given ATF's available resources, and the fact that ATF had no idea as to the magnitude of the problem, coupled with ATF's need to act quickly in this matter, that the absence of a fully verifiable paper trail is understandable if not justified. However, we are planning to set up an in-house committee to review our testing and removal procedures and policies.

F. FDA involvement

1. FDA/BATF understanding: Describe any written agreement or other arrangement which BATF has with FDA concerning the testing and regulating of contaminated wines.

ATF FDA and ATF do not have a written agreement concerning the testing and regulating of contaminated wines. On the other hand, we have an ongoing arrangement that allows the agency that can best handle a specific contamination to test and regulate the contaminated wines.

2. Consultations with FDA: Did BATF consult with FDA and solicit FDA's advice on the adequacy of its proposed procedures and system in identifying and removing seriously contaminated wines, particularly given FDA's greater experience in testing for and removing contaminated food products? If so, indicate FDA's response. If not, why not?

ATF No, we did not consult with nor solicit FDA's advice on the adequacy of our proposed procedures and system in identifying and removing seriously contaminated wines, prior to doing so. Our policy as stated previously was to remove all wines containing any amounts of DEG because of the information received from FDA that according to law DEG was not acceptable in wine at any level.

Contaminated Imported Wines

G. BATF Procedures and Policies in Identifying and Removing Methanol Contaminated Wines and BATF's Findings

1. Indicate how BATF's procedures and policies for treating the methanol contaminated wines differ from those which it followed for the DEG contaminated wines.

ATF The only difference in the procedures and policies for identifying and removing methanol contaminated wines as opposed to DEG contaminated wines is the paper trail.

2. Please provide a status report on BATF's testing and removal of these wines.

ATF No Italian wines have been removed by ATF from the marketplace. All commercial laboratory reports submitted to ATF from industry to date have disclosed safe levels of methanol, i.e., less than 0.1% by volume. All market samples of Italian wines tested by ATF's laboratories in San Francisco and Rockville also show safe levels of methanol.

After receiving documentary assurances from the Italian government that all Italian wines bottled or shipped prior to December 12, 1985, were free of methanol contamination, ATF issued Industry Circular #86-10 dated 4-21-86.

This circular advised industry of the procedures to follow for the testing and documentation of methanol in Italian wines bottled or shipped on or after December 12, 1985 which were currently in their inventories and those of their retail customers, in Customs bonded warehouses awaiting release, or in transit from Italy. In essense this circular requires the testing of all Italian wines which are not covered by a "Certificate of Analysis" issued by an Italian testing laboratory approved by the Italian Ministry of Agriculture.

All testing of Italian wines performed by commercial laboratories or Italian approved testing facilities are documented by way of laboratory reports which shows the percent of methanol content by each brand and type of wine tested. These laboratory analyses are being maintained by the individual industry members and ATF's Alcohol Import-Export Branch.

Contaminated Imported Wines

H. BATF's Response to GAO Report's Recommendations

ATF ATF believes that it's actions in testing wines for DEG, consisting of contacting the industry with the identified contaminated wines and directing them to remove the wine from the market, the numerous press releases warning consumers not to drink the identified wines, our liaison with the various state liquor administrators and military supply organizations, and our nationwide checks of the removal activities at wholesale and retail levels, were more than adequate to protect the public health and safety in this matter. FDA officials have indicated that they concur with our handling of the response to this problem.

Furthermore, we have agreed to explore the development of a memorandum of understanding between FDA and ATF which would develop appropriate policies and procedures for working with FDA regarding any future contamination of alcoholic beverages.

Finally, we agree to report to the appropriate oversight committees as well as to the House Government Operations Committee on the results of these consultations and any actions taken.

I am proud of our staff, and gratified by the tremendous support of the Food and Drug Administration and numerous state agencies in the successful consumer protection initiative. Do we have enough resources? Are the laws which we enforce perfect? I suspect that you gentlemen have your own thoughts on these subjects. At the bottom line, however, I believe that we have a consumer protection system that is fundamentally sound.

I'll be happy to answer any questions.

Mr. **Barnard**. Mr. Drake, the question of BATF's authority at every stage, tied into what BATF actually required and the actions it took, is an important one, I think. I am going to ask you questions going from stage by stage in the process.

Does BATF have authority to require that importers test wine products for contaminants, and also that wholesalers do the same?

Mr. **Drake**. On the importers, sir, we do have that authority. On the wholesalers, I believe it is covered by the law, but I believe it might necessitate regulations to make that applicable to the wholesalers.

Mr. Manfreda can correct me.

Mr. **Manfreda**. That is correct.

Under section 202(d) of the FAA Act [Federal Alcohol Administration Act], we do have the statutory authority, if implemented by regulations to require a wholesaler to submit such analysis to the Bureau. At this time, there is no implementing regulation.

Mr. **Barnard**. Mr. Drake, did the BATF exercise that authority here? What did it specifically require of importers and wholesalers?

Mr. **Drake**. We required the importers to have the wine tested.

Let me start again. We stopped—our first concern was stopping what was coming into the country, which we did through working closely with Customs. We stopped it at the ports. Nothing could be entered unless it was tested and shown as clear.

Contrary to what has been said earlier, we did start our testing before the Canadian Government contacted us. In fact, we contacted the Canadian Government.

We saw the article in the Washington Post. I wish there were another process in which problems like this that occur in foreign countries could surface quickly. At this point in time, there aren't. We saw the article in the Washington Post. We took the initiative to start testing not only Austrian wines but other imported wines, as well as other American wines, and then started the contacts with the Canadian FDA.

Back to your question. We sent our circulars to our regional offices, had them printed and sent to all the wholesalers and importers in those regional offices. The reason for that was they could get the document printed much faster and distributed much quicker than we could had we gone through the regular process in Washington of having a document printed.

Mr. **Barnard**. You had already discussed this problem with the FDA at that time?

Mr. **Drake**. That is correct.

Mr. **Barnard**. They already agreed you would be the agency to take the initiative in this matter?

Mr. **Drake**. That is also correct. They gave us at that point in time a somewhat unofficial conversation over the telephone as to what the risk levels were. I use that in my terms, not in theirs or GAO's terms. They told us the DEG was hazardous at certain levels. They were putting the report together to send to us, but I didn't feel we could wait for the report to arrive. We had an immediate problem with the American consumer at risk.

Mr. **Barnard**. Ultimately, your primary responsibility is in the labeling of the product; right?

Mr. **Drake**. That is correct, from a totally legal perspective. From an ethical perspective, we have the concern for the health and well-being of the American consumer, whether it is diethylene glycol——

Mr. **Barnard**. When would you have involved the FDA in this procedure?

Mr. **Drake**. Immediately; quickly. We could not make a judgment on DEG as to what the harm was.

Mr. **Barnard**. In the process, you did discover some DEG; right?

Mr. **Drake**. That is correct.

Mr. **Barnard**. What steps did you then take after that?

Mr. **Drake**. We recalled those products; had the wholesalers and importers recall those immediately.

Mr. **Barnard**. Without counseling with the FDA?

Mr. **Drake**. Not at that point in time, no.

Mr. **Barnard**. This is where the question of authority does come in. You had the authority to take them off the shelves because of the labeling?

Mr. **Drake**. Yes, sir; again, in an indirect way. The wholesaler has a permit under the act, as does the importer. If they violate the terms of that permit, we can revoke it or suspend it. We can put them out of business rather quickly.

If they distribute a wine or any kind of product that is mislabeled, they put a product on the market that should not be there, that is a violation of the terms of their permit. That is a rather effective tool to get them to react, to recalling that product from the marketplace.

Where we do sort of break down is at the retail level. We don't have direct authority over the retailers. The States do. The vast majority of States have a direct line on the retailers. The States were extremely cooperative in this entire process.

Mr. **Barnard**. In light of the other question I was asking, how many importers and wholesalers furnished copies of laboratory reports to the BATF, either positive or negative test results?

Mr. **Drake**. My recollection is about 26 or 30.

Mr. **Weininger**. That is correct.

Mr. **Barnard**. Twenty-six?

There are 250 known importers of Austrian wine. So, only a relatively small percentage sent in the samples?

Mr. **Drake**. Yes, sir. At least only a relatively small percentage advised us of what they did.

Mr. **Barnard**. Once you determined that there were very few that sent in laboratory samples, did you take any actions against importers or wholesalers to get more importers to comply and send in test samples?

Mr. **Drake**. No, sir. I am afraid we did not, with that intent and purpose. We did keep contact with certain importers whose names turned up repetitively on the list. We did not send people out specifically to see why those importers who did not report to us did not return to us. We did not do that.

Mr. **Barnard**. Mr. Drake, concerning importer/wholesaler submission of reports to BATF on names of distributors and retailers carrying suspected wines, you emphasized, Mr. Drake, the amount of time required to visit importers and look through their records to trace their wine to wholesalers, distributors and retail customers and that this was not feasible. I want to address your ability to require that the importers/wholesalers do this for you.

For example, does the BATF have the authority to require importers and wholesalers to submit the names of distributors and retail customers carrying suspect wines so you could trace it?

Mr. **Manfreda**. Presently, we have that authority under that same provision I cited earlier, section 202(d) of the act. It is statutory. It has not been implemented by a regulation at this point in time.

Mr. **Barnard**. Did BATF exercise its authority and require such reports in this instance?

Mr. **Manfreda**. No, sir, we did not. We requested information, but did not require.

Mr. **Barnard**. Is there any reason why not?

Mr. **Drake**. Only the press of time, Mr. Chairman. It was a new experience for us, a very new experience.

Mr. **Barnard**. In hindsight, would this have overcome the problem of having to go through the records and focus BATF's resources on known distributor patterns?

Mr. **Drake**. I am not sure it would have, if I understood your question. If we had the wholesalers send to us the names of the retailers they distributed wine to?

Mr. **Barnard**. Yes.

Mr. **Drake**. It may have allowed us to focus, identify. I have a suspicion the number involved would still be a very large number. There are in excess of 500,000 retailers in the United States. As to how many of those carry Austrian wine or German wine or Italian wine, I would have to guess for you and say 80 to 90 percent.

No, I don't know of what resources we could pump in to verify whether or not what the wholesaler/importer told us was true, and whether or not the retailer did in fact remove the wine. We did, and are continuing to, I use the term "spot-checks," with retailers, and still finding on occasion, unfortunately, Austrian wine still on the shelf someplace. We have contacted about 6,000 retailers. We will continue to do so for the Austrian wine, the diethylene glycol, as well as other revenue matters involved in other issues.

Mr. **Barnard**. Do you have authority to require importers and wholesalers to obtain wine samples or remove suspected wines from retailer premises after or prior to a determination of contamination?

Mr. **Manfreda**. We do not. This is an issue that came up with respect to GAO's testimony. You were quoting from questions 3, 4, and 5 of our prepared testimony.

BATF has advised GAO we have absolutely no product recall authority. We have other mechanisms available legally to deal with the problem, but at this point in time, neither the FAA Act nor the Internal Revenue Code provide us with the legal authority to recall.

Mr. **Barnard**. Regarding that, please explain how you can direct wholesalers, retailers and importers to take such actions without authority to require them to do so.

Mr. **Drake**. That would come under the terms of the permit. Again, when they put an illegal product—if you let me use that term——

Mr. **Barnard**. You don't see any missing gap in a comprehensive systematic enforcement effort here?

Mr. **Drake**. I think there would be.

Mr. **Barnard**. A missing gap?

Mr. **Drake**. Yes, absolutely.

Mr. **Manfreda**. With respect to that, you are referring to the press release and our indication that should they sell these contaminated wines, since they are mislabeled, we have the ability to take permit action against a wholesaler or importer since a condition of their basic permit is compliance with the labeling requirements of the FAA Act.

Our vehicle control then is through the permit action on the particular importer or wholesaler. However, it stops short of having the ability to recall a product from the market that is so contaminated, sir.

Mr. **Drake**. There is another aspect of this, too. We have dealt with this industry—I personally have since 1960. This agency has, since 1935 or thereabouts. Historically, 98, 99 percent of them are extremely reliable.

What we saw occur in this instance was a very reliable industry reacting very responsibly to a very serious problem. In addition, even if they didn't do it because of the ethical and moral responsibility they have, they have product liability concerns they would have to worry about, as well. I think all of those focused in as well as our ability to revoke their permit and the right to do business if they did not. All of those focus in to make a reputable businessman take the appropriate action.

Mr. **Barnard**. Did you have any occasion, or have any reason, to share the fact that there were some missing gaps and possibly you lacked some jurisdiction? Did you ever share that with the FDA?

Mr. **Drake**. Not while this process was going on. We have, since that time, met with FDA in reaction and response to the GAO recommendations to determine whether or not and to a level any kind of memo of understanding should be developed and procedures defined. We have talked about that issue with them; have come to no conclusion, but have talked about that.

Mr. **Barnard**. Mr. Erdreich.

Mr. **Erdreich**. Thank you, Mr. Chairman.

Mr. Drake, you mentioned the control States as well as States that don't have that sort of system of control over alcoholic beverages. I think in your testimony there are 18 control States?

Mr. **Drake**. That is correct. And Montgomery County, by the way.

Mr. **Erdreich**. Since the time that the DEG problem has arisen have you now added DEG sampling testing to your routine testing?

Mr. **Drake**. That is correct.

Mr. **Erdreich**. Do the States also engage in testing of alcoholic beverages?

Mr. **Drake**. Some States very definitely have. During this process, the State of Michigan contacted us. That may be where some of the duplicate samples came from. They were testing during that period of time. I am fairly sure the State of California was testing during that period of time. The State of New York was testing during that period of time.

States do also test, and universities in the States we know test; if not under State direction, at least under their own process.

Mr. **Erdreich**. Is it your understanding that 50 States do testing?

Mr. **Drake**. No, sir; I wouldn't go that far. Just the ones I do know.

Mr. **Erdreich**. The largest ones?

Mr. **Drake**. The ones we had contact with during this period of time we did testing.

Mr. **Erdreich**. Was the testing generated by this occurrence or do they routinely engage in testing on an ongoing basis?

Mr. **Drake**. I am going to have to guess for you. I would guess California being heavily involved, the University of California at Davis, Fresno State. I suspect in New York, Cornell University does some. Those would be guesses on my part. I can't answer the question.

Mr. **Erdreich**. My question, then, is: Does your office, your Bureau, routinely receive the results of State testing?

Mr. **Drake**. No, sir; only if there are specific issues that come up, as diethylene glycol. I am confident if a State laboratory tested and found a contaminant or pesticide, they would contact us or FDA. As far as routinely, no, sir, they do not.

Mr. **Erdreich**. I guess I liked your suggestion earlier, which I would concur in, that we need some sort of hotline between us and foreign governments that are engaged in testing so we don't need the Washington Post or whoever alerting us to a potential problem.

Do you think there is also a need to have better communication from States to your Bureau, and vice versa?

Mr. **Drake**. I think the vehicle is there. We have very good relationships with the State agencies, and with those States, such, again, as California and New York, who are involved heavily with wine, with their educational systems out there. We have very good relationships. I think the vehicle is there. I think it is there on an ad hoc basis.

I am sure—I would hope it could be formalized. Maybe that is a vehicle we should also look at.

Mr. **Erdreich**. Certain resources are being expended at the State level and limited resources at our level, as well. If we could marry those, it would be in the best interest of all of us. I think the limited dollars would go further, the tax dollars, whether it is State or Federal.

Mr. **Drake**. I am sure that could be arranged. We send people to the University of California at Davis to act as instructors through their oenology classes. We do that at Fresno, also.

Mr. **Erdreich**. At the early point of the DEG occurrence, I think I heard in the GAO testimony that at first the Austrian Government issued a statement or informed—maybe your Bureau—not to worry, that the wine that had DEG in it was only for domestic consumption.

Mr. **Drake**. Never got out of the country, they said.

Mr. **Erdreich**. Do you have any knowledge of why that sort of statement was made in the beginning by the Austrian Government and how quickly did they correct themselves?

Mr. **Drake**. I would be speculating on why they did it. I think they had internal problems. There may have been a coverup over there that went on for a rather lengthy period of time. I understood there were Government problems involved around this.

What they did, once we found it, confirmed it, and the Canadians were confirming it, then began a rather high level of cooperation from the Austrian Government. It was only after we had cut the cards, so to speak.

Mr. **Erdreich**. Not just this instance but any others that you in the Bureau may have come upon, have you had good cooperation from foreign governments and your counterpart agency of whatever it might be in this or any other instances?

Mr. **Drake**. Generally speaking, yes. The only other instance I can deal with with a degree of accuracy would be the methanol issue in the Italian Government. They were extremely responsive. Even the degree of honesty that they knew would hurt their industry by saying we cannot guarantee to you that none of this wine was shipped to the United States. They could have obviously guaranteed us. It would have had some impact on our reactions.

When they told us we definitely cannot guarantee you, we thought that was a very ethical thing for that Government to do.

Mr. **Erdreich**. Lastly——

Mr. **Drake**. Excuse me a moment.

Mr. **Weininger**. I must say in dealing with diethylene glycol with the German authorities, they were most cooperative in giving us information as to what was going on with regard to this problem.

Mr. **Erdreich**. I would hope we, not by my suggestion but by your initiation, do formalize some sort of informational system between our counterpart agencies. Maybe we have done that.

Mr. **Drake**. Just for your information, with some reservation, I am leaving for Paris on Saturday evening to meet with an organization called OIV. It is an organization of federal governments throughout the world that are dealing with wine. This is one of the issues that I am sure will be dealt with, plus the concern for and need for an early alert, early warning system when this thing does occur.

Mr. **Erdreich**. Thank you, Mr. Chairman.

Mr. **Barnard**. Mr. Horton.

Mr. **Horton**. Thank you, Mr. Chairman.

Mr. Drake, I don't want you to feel defensive. I didn't ask the GAO to pick on your agency. I commend your agency. I think your agency does an excellent job. Don't think the purpose of this hearing is to nail you to the wall, or anything like that.

Mr. **Drake**. Thank you.

Mr. **Horton**. I started my discussions with the GAO, as I indicated earlier, as a result of my concern about some of these concentrates coming into the country, and whether they meet the same standards we have in this country. As a result of the DEG matter, I asked that they find out, audit, and tell us what mechanisms we have in place to find out about these type of contaminants in foodstuffs—in this particular case, wine.

I certainly have no problem with you saying your people worked hard. I certainly don't want to indicate any degree of lack of confidence in the people that work there. I personally feel Federal employees are underpaid, hard-working, and in most instances go way beyond the call of duty. I think that that is true, particularly in your agency.

But I am glad that it happened the way it did. I am glad no serious illness or fatalities happened as a result of it, at least as far as we know.

But what I was trying to get to, what I am still trying to get to, is that we must find some way that we can prevent contaminated foodstuffs and wines—whatever—coming into this country. I think your agency has a responsibility. You do have a responsibility with regard to American wines.

Is that correct?

Mr. **Drake**. That is correct.

Mr. **Horton**. What do you do there? Tell us.

Mr. **Drake**. We have onsite inspection activity at the American wines. That—there are chemicals, if you will, that are allowed to be used in American wine.

Mr. Mrazek made reference to some before when he said the Wall Street Journal said they were illegal. I think that was a misstatement on their part. There are 200 or some chemicals that can be used in the production of American wine. They are not harmful. They are approved by FDA. They are on the GRAS list. Many don't wind up in the final product. They are used as, for example, fining agents. They don't end up in the finished product.

We have onsite inspection activity of the American wineries. We don't on the foreign producers. There is no onsite inspection. We must rely on samples that we picked up in the field.

We have a market basket sampling program that has been in effect for 5 or 6 years where we randomly go out in the country, five major metropolitan areas, through a stratified or scientific structured sampling program, take samples of predominantly if not exclusively imported products, and test those.

The dilemma that comes down—I think it was referred to by Mr. Domenick when he said there is no way you can test a product for any potential contaminant unless you know what you are looking for. You just can't.

Mr. **Horton**. You do know you are looking for DEG?

Mr. **Drake**. That is right. That is part of our testing protocol now. So is methanol. Methanol has been for quite some time. We automatically tested for methanol.

Mr. **Horton**. It is an accurate statement to say BATF strictly regulates and monitors domestic, American wineries and vineyards for pesticide levels, pesticide use, integrity, ingredients——

Mr. **Drake**. Not pesticides. That is EPA.

Mr. **Horton**. Agriculture does that.

Ingredient integrity?

Mr. **Drake**. That is right.

Mr. **Horton**. Bottle tracking?

Mr. **Drake**. That is right. We also collect about $10 billion in revenue, which is important to us, as well.

Mr. **Horton**. You have a very vigorous program.

Mr. **Drake**. Yes, sir.

Mr. **Horton**. With regard to American wines and wineries?

Mr. **Drake**. That is correct.

Mr. **Horton**. What is done to assure public health? Do you know what standards other wines that are imported into this country are subjected to? Do you have knowledge with regard to what other countries do?

Mr. **Drake**. No, sir; I do not.

Mr. Weininger?

Mr. **Horton**. Do they basically live up to the same standard?

Mr. **Weininger**. I know some of the nations do have some requirements. I know of some of the requirements they do have over there in the wine industry. I am not familiar with every country in the world, Mr. Horton, as far as what the requirements might be. Some are more stringent; some are less stringent.

Mr. **Horton**. You said earlier, when the chairman was asking some questions, that you have not issued regulations to require wholesalers to test suspected contaminated wines. Are you considering doing that?

Wouldn't that be a good idea to do that?

Mr. **Drake**. That is under consideration again in reaction to the whole issue of DEG and the methanol issue. We are second-guessing everything we did. What can be done in the future with available resources we have, which is another concern, not just field inspectors, but also our laboratories.

We have a laboratory in San Francisco, and one in Rockville, MD, and one in Atlanta, GA, that also has restrictions and limitations on what they can do.

Mr. **Horton**. Do you need any additional legislation in order for you to carry out your mission and your role in this respect? When I say in this respect, I mean with respect to contaminated wines or any contamination in wines?

Mr. **Drake**. My first reaction is probably not, but I will ask Mr. Manfreda his reaction. That would be the possibility of a recall authority.

Mr. **Manfreda**. There could be some areas which would close the gap that exists currently with our authority between product recall and effectuating an action on a permit based on mislabeling. We are currently studying the problem, sir, and we expect to have recommendations sometime before the end of the year, and we would be glad to provide the committee such.

Mr. **Horton**. I think it would be helpful for you to give us your analysis of the legal authorities that you now have and also tell us whether you need additional authorities, additional legislation in order for you to carry out your role in this.

[The information follows:]

In reference to your request that ATF submit an analysis of its legal authority over contaminated wines, we believe that pages 1 to 5 of our prepared, submitted testimony to the committee clearly set forth our authority in this area.

Mr. **Horton**. It seems to me, and you said in your statement, that based on the information that you got from the FDA, the only conclusion that you could come to was that the presence of any amount of DEG in wine posed a potential health threat.

Now, with that, it seems to me that there is a real responsibility on you to put in place the mechanisms that you will need to track that. You did indicate that you are testing now for DEG. Is that a permanent requirement?

Mr. **Drake**. That will be permanent.

Mr. **Horton**. You have extended that also to the Italian wines?

Mr. **Drake**. That is correct, plus the Austrian Government. The German Government and the Italian Government are three that I know of for sure that are testing before a wine is exported, are testing for DEG as well. So we have hopefully testing on both sides of the ocean.

Mr. **Horton**. Earlier, Mr. Chairman, we were talking about the legal authority. This is an industry circular from the Department of Treasury Bureau of Alcohol, Tobacco and Firearms and I would like to put it in the record, dated April 11, 1986. It is a product alert.

On page 2, signed by the Director, Mr. Higgins, just to show that they do have this authority that they were talking about, this has to do with the Italian wine situation. It says on page 2,

> Italian wines found to contain unsafe levels of methanol are considered by ATF to be mislabeled and not eligible for sale in the United States. Therefore, any wholesaler or importer who conducts transactions in Italian wines on or after the date of this circular without having all brands tested for safe levels of methanol and whose wines are subsequently found to contain methanol in excess of 0.01 percent by volume will be considered by ATF to be in willful violation of the FAA Act and subject to suspension or revocation of their FAA basic permit.

That is what you were talking about a few moments ago.

Mr. **Drake**. That is correct.

Mr. **Horton**. And that is a good illustration of what your authority is.

Mr. **Drake**. Yes, sir.

Mr. **Horton**. So I think it would be appropriate to put this in the record at this point, Mr. Chairman.

Mr. **Barnard**. Would the gentleman yield?

Mr. **Horton**. Yes.

Mr. **Barnard**. Mr. Drake, I thought that any amount of methanol in wine was against the law.

Mr. **Drake**. No, sir; any amount of methanol—I hope I am right, but FDA would be more accurate on this than I am—but any amount of methanol added would be illegal, but it can and will occur in small amounts below that 0.01 percent volume level by the seeds, stems, and pulp of the grape could result in methanol. Our history in testing it shows it is well much below that level, actually it is 0.03, 0.003 kind of level we are finding.

Mr. **Barnard**. But not DEG.

Mr. **Drake**. DEG at no level can be in there.

Mr. **Barnard**. Without objection, that will be included in the record.

[The Product Alert is found on pp. 36–37.]

Mr. **Horton**. Mr. Chairman, I have a number of other questions. I think I will submit them in writing and ask you to submit answers.

[Mr. Horton's questions and the Agency's responses follow:]

We are pleased to provide answers to Congressman Horton's additional questions concerning our written testimony presented to the Commerce, Consumer and Monetary Affairs Subcommittee on May 28, 1986.

(1) On page 7, you testify that you identified approximately 250 importers who had label approvals for Austrian wines.

Q. When was this done?

A. As indicated in our testimony, we identified, through our computerized index of Certificates of Label Approval, 1800 labels approved for white, red, and rose Austrian wines. This list was run, sometime during the week of July 15 - 19, 1985, after learning of the possible contamination of Austrian wines with DEG. This list contained, in addition to labels approved for Austrian wines, vendor codes and basic permit numbers of importers.

Q. Was such a list ever provided to GAO?

A. Yes. GAO was provided an identical list to the one mentioned above.

Q. GAO reported that such a list was not made. Why would they have reported that?

A. We have no idea why GAO reported that such a list was not made.

Q. GAO reported (on page 8 of report) that you contacted all importers and wholesalers, rather that those holding approved Austrian label permits. Is this correct? If so, why didn't you just contact those who you knew to have been licensed to import Austrian wines?

A. Yes. Although an importer may hold the label approval for a specific product, they may not necessarily distribute the product to the retail market. It may be distributed by other importers and wholesalers. Therefore, our decision was to notify all importers and wholesalers.

ADDITIONAL MATERIAL

(2)

Q. Why didn't ATF set up a follow-up system to determine why only 26 importers submitted test results? Have you received reports from the permittees who import the five or ten most highly-contaminated wines? Have you revoked the import license of any importer of Austrian wine who has failed to submit test results?

A. Basically we did not have any reason to suspect that an importer would not follow the procedures set out in the product alert. In regulating this industry for a considerable period of time, we have found that the vast, vast majority are reliable, responsible business people who would not knowingly nor intentionally do anything that would jeopardize their customers, the American consumer. In retrospect, we should have established a process to validate that those importers who did import Austrian wine, did submit the results of the tests that had been conducted. We did implement this type of process in relation to the methanol issue. As I mentioned earlier, we did keep in contact with certain importers whose names turned up repetitively on the list. Moreover, early on in our investigation, we conducted DEG tests for some wholesalers and importers.

However, as I noted earlier, these procedures were changed when we implemented testing for methanol. We required importers and wholesalers to provide us with a notice stating whether or not they handled Italian wines. If a notice is received stating that they handle Italian wines, we will compare their name with the list of distributors who have submitted analyses indicating methanol testing. If an analyses has not been received, we will contact the importer and wholesaler to obtain said analyses. If a notice is not received from an importer or wholesaler, they will be contacted again to ascertain if they handle Italian wines.

We have received results of DEG testing from the four distributors who imported ten of the wines that were highly-contaminated.

We have not revoked the import license of any importer of Austrian wine. We do not have any evidence, at this time, that an importer or wholesaler did not submit test results.

ADDITIONAL MATERIAL

(3)

Q. The GAO testimony (in Appendix IV) indicates that four importers handled 37--or 69%--of the 54 contaminated Austrian wines, and these four handled the 5 wines with the highest levels of DEG. Did the Bureau take any action against these four importers in connection with this matter? Wouldn't it make sense to target your efforts against these particular importers based on these figures?

A. The Bureau initiated the same action against these four importers as we did other importers with contaminated wines. This involved notifying each importer that their wine was contaminated and should be removed from the market. The Bureau took the position that any wine containing any amount of DEG was prohibited and therefore was given the same removal priority.

As to whether we should have targeted our efforts against the four importers who handled 69% of the contaminated brands, during the period of the notices, recalls, testing, etc., I don't believe that we would have known that, as a fact. If we had known the distribution patterns, before the problem was surfaced, we would have put some additional emphasis on those four importers.

However, since we didn't know that distribution pattern until after the problem had been identified and basically resolved through sampling, testing, etc., we exercised our best judgment at that point in time.

(4)

Q. You have the authority to require importers and wholesalers to submit reports of wine testing. But you have no authority to require reports on actions taken to remove wine known to be contaminated from retail sale. Is this correct? if so, it appears that the consumer is the one who takes the risk under this arrangement. Do you think someone in the Government should have such authority? In your opinion, what is the best way to get contaminated wines off the retail market? Who should have the authority to do so?

A. We do have the authority to require importers and wholesalers to submit reports of wine testing.

ADDITIONAL MATERIAL

However, our statutory authority is extremely limited and we cannot require reports from retailers on actions they have taken to remove wine from the retail market. The authority needed normally comes from the Governmental body, whether it be Federal, State, or municipal, that has licensing power over that particular sector of the market. At the retail alcoholic beverage level, this authority rests with either the State, county or city. The problem, however, is that the action required to enforce removal of contaminated wine at this level is by the very nature of the diversified statutory authority, results in a highly fragmented, arbitrary, and unverifiable system for the ensured removal of contaminated wine from the final commercial link the marketplace - the retailer.

In the case of known contaminated alcoholic beverages, central authority for ensuring the removal of said products from all levels of the trade should rest with the BATF. This conclusion is based upon the existing licensing control exercised by ATF over importers and wholesalers. Commercial records at the wholesale level should indicate all sales to retailers. To take this line of continuity one step further, i.e., to have legislated authority to require documented and reported action at the retail level by wholesalers and retailers, with commensurate penalties for noncompliance, would greatly help to ensure removal of the contaminated product. Presently, press releases, media communication and word of mouth imparts no legal obligation on the retailers to perform and document removal action. This is no deterrent to unscrupulous or innocently ignorant U.S. retailers.

(5)

Q. You testify (on page 14) that you were more interested in protecting the consumer from a possible health hazard than leaving a proper paper trail. Yet you testify (on page 13) that no priority was given to act against the more highly contaminated wines, but that wines of any level of contamination had the same removal priority. Aren't these two statements inconsistent?

A. If the premise of your question was correct as it is stated, then we would have to agree with you that our two statements, as you have expressed them, would be inconsistent.

ADDITIONAL MATERIAL

However, there seems to be a misunderstanding as to what we mean by our statement from page 13 re: "priority."

We meant exactly what we said when we stated that wines of any level of contamination had the same removal priority.

The justification for this position is only valid if all parties involved in the decision-making process accept only one level of priority - that is, that removal of all contaminated wine was of the most highly critical priority; and that was the sole and universal approach of the Bureau. At every new discovery of a contaminated wine in the American market place, whether it contained 1 ppm, 100 ppm, or 1000 ppm of contaminant, we approached that wine as if it was a loaded gun with a hair trigger, pointed at the American consumer. As each new wine was found, we rallied all resources with the same zeal.

We approached all findings in this manner for one major reason. Not being a health agency, we depended upon others for information on the health risk to the American consumer. We judged that the information being supplied to us at the time did not clearly indicate, because of both short term and long term effects, that one level was a lesser health risk than another. This is not a criticism of those supplying us with scientific information. It is the reality of the moment. Because of this situation, we decided it was in the best interest of the American consumer if we had no second, or third priorities, but only a "top" priority.

Mr. HORTON. I do have one other question, though, that has to do with the overall answer to this problem so it won't happen again.

What do you recommend? I am not critical of what you did. I wish you would have done it a little differently and I note you have said in your statement that you wouldn't change what you did. Now you did do it differently in the Italian situation than what you did before.

In other words, you did gain from experience.

Mr. DRAKE. Yes, sir, we did.

Mr. HORTON. But what do you feel you have to do in order to have the authority or in order to provide the protection that we need to have with regard to contaminants in wine?

Mr. DRAKE. We probably need a better intelligence-gathering system for lack of a better term to know what is happening in different parts of the world, what is the possibility of something showing up that is occurring right now that we may not learn about for 4 or 5 months down the road. That material could already be here.

So we need a better intelligence-gathering and analysis system. We probably do need better testing protocols probably to let us do a random kind of testing process on products.

What do you next look for? Cyanide in wine? Why would they put cyanide in wine? Beats the heck out of me.

Mr. HORTON. Why put methanol in other things? Johnson & Johnson has been having a lot of trouble.

Mr. DRAKE. Why would people put methanol in wine, which makes no sense? So that is the thought process we have to go through to determine what kind of protocols can be developed, multipurpose protocols if possible to be sure there are other elements that we—the reference to the States allowing States to be involved in making sure.

We assume the State will tell us if they came across anything. We assume that. That is a reachable assumption, but we better be sure the State makes the same assumption that they would know, the University of California would know if they came across some hazardous chemical in a product that they would tell ATF or FDA immediately.

We have to make sure those assumptions are understood by both sides.

Mr. HORTON. Do you need more personnel to do this job?

Mr. DRAKE. You are asking a career civil servant if he needs more personnel.

Mr. HORTON. Well, can you do it with what you have got or is there a need for additional personnel? We are talking about the public health here. That is a very important responsibility.

Mr. DRAKE. We have public health concerns.

Mr. HORTON. I think the taxpayers are willing to pay a reasonable amount to make certain that their food products and wine are safe for consumption.

Mr. DRAKE. We have public health service concerns, Mr. Horton, also in the explosives area, for example. There are some 8,000 explosive dealers that have explosives stored and hopefully not near schoolyards and not near churches and not near residences. That is one of our responsibilities.

Mr. HORTON. I understand.

Mr. **Drake**. The FAA Act is a responsibility. The collection of $10 billion is a responsibility, 260,000 firearms licensees become a responsibility. To say are there available resources for all of these if we knew exactly where to concentrate those resources every time, the probability is that we would have enough, but we were not—when DEG hit, when methanol hit, when the fireworks factories start to explode, unfortunately we are spread very, very thin and resources always can be used effectively with effective management.

Mr. **Horton**. One other thing. I understand that domestic or American wineries are required to keep chemical logs which show all the chemicals that they purchase and have in inventory, and then give an inventory detail as to when they are used.

Are foreign wine producers required to do this same sort of thing?

Mr. **Drake**. Not by the U.S. law.

Mr. **Horton**. I know that. We don't require it, but do other countries put those same kinds of requirements on? You do require these logs, do you not?

Mr. **Drake**. Yes, we do—well, they have to keep records of any article or chemical or grapes, where the grapes came from, what variety they were. Those records must be available to allow verification of the process being done in the United States.

Mr. **Horton**. And you check it?

Mr. **Drake**. We do check them.

Mr. **Horton**. And you check them closely?

Mr. **Drake**. We check them as closely as resources available will allow us.

Mr. **Horton**. If there is some chemical missing, you will find out why it is missing?

Mr. **Drake**. Yes. Yes, sir. I am sure that many foreign countries, France, Germany, Italy, probably have strict regulations. I say probably. Enforcement may be a different element. I don't know about enforcement.

Mr. **Horton**. Thank you, Mr. Chairman.

Mr. **Barnard**. Mr. Drake, is there any overlapping then of responsibility between your agency, ATF, and the FDA?

Mr. **Drake**. Perhaps not overlapping as much as dovetailing. We won't allow anything to be used in an alcohol beverage that FDA has not certified generally recognized as safe for use in alcoholic beverages.

Mr. **Barnard**. So, in other words, in this particular instance with FDA giving you—and I am sure Mr. Taylor will respond to this, too—giving the ATF responsibility in this particular case, even though your responsibilities are different, yours is in labeling, and theirs is in health protection. Yours is not in health protection?

Mr. **Drake**. Not primarily, no. Not legally, no.

Mr. **Barnard**. Is there anything that can be done in the law to clear up this inconsistency?

Mr. **Drake**. Personally, I don't think so. I think the relationship between us and the FDA is and has been and will continue to be a very positive one to operate effectively when the problem arises. I think that DEG is an example where we did operate rather effectively when the problem arose.

The methanol is an issue where we operated even more effectively because we learned from the first time out. I think the two agencies, whether we need a memo of understanding or not, I am not sure. We have gone along well without the formalized memo of understanding. I understand that that would be beneficial for an outsider to look at and say, "Here is where you fix responsibility."

In my estimation, we, the Government, we, ATF and FDA, are responsible, whether that may be delegated to us or not, we feel that responsibility.

Mr. **Barnard**. This is what brings me to this question. BAFT has never conducted a recall of a wine, let alone a nationwide recall, according to the information in your appendix. Would it not have been useful to solicit the advice of the FDA and the Consumer Product Safety Commission to find out how to go about it? For example, the Consumer Product Safety Commission requires submissions of reports from various entities in the chain, which might have been useful here in placing more responsibility on wholesalers and importers to advise you of their actions. And the CPSC probably has more nationwide recalls than any other agency around. Wouldn't this have been a useful exercise to have coordinated your efforts with these two agencies?

Mr. **Drake**. Mr. Barnard, I am sure it would and if the time were there, we probably should have done that, but we had what I still believe was an immediate problem to deal with. We dealt with it immediately, and the primary concern was to protect the American consumer.

Mr. **Barnard**. I want to join Mr. Horton in what he says about the agency. We are not here this afternoon to try to hold you responsible for anything beyond your control, but we do have a glaring gap here in the examining and handling of imported products. This is what concerns us more than anything else. I think we have got some lessons to learn for the future. Congress has some things to do.

Mr. **Drake**. So do we.

Mr. **Barnard**. So I want to say I associate myself with his remarks and hopefully we can come up with some very positive suggestions about it.

Mr. Mrazek.

Mr. **Mrazek**. Thank you, Mr. Chairman.

Mr. Drake, can you just state for the record whether you have all of the sophisticated testing equipment and laboratory personnel that you need to guarantee in terms of public safety, that all unauthorized ingredients can be found with the equipment and personnel that you presently have?

Mr. **Drake**. No, sir. I am sure that we would not. We have just recently found another piece of equipment that was necessary for testing called a Hall detector. We went out and bought it.

So to say we have all that could be necessary for a total comprehensive testing program to take care of anything that could come up, I am sure we would not have that equipment or personnel.

Mr. **Mrazek**. Are there specific examples of equipment that you don't have now that you do require based on current technology to determine whether unauthorized ingredients are in products imported?

Mr. **Drake**. I am sure there are. I don't have that, but we will get you that information for the record if that is OK.

[The information follows:]

We are pleased to provide you with specific examples of equipment needed, at this time, to determine whether unauthorized ingredients are in imported products as well as the number of personnel authorized to operate the equipment listed below.

Equipment Needed For Examining Imported Beverage Alcohols For Contaminants

Quantity	Instrument	Cost	FTE
1	Gas-Chromatograph/Fourier Transform Infrared Spectrophotometer (GC/FTIR)	$125K	1

This instrument is used for rapid screening of alcohol beverage products for a variety of contaminants. It is needed to "profile" products to accumulate the data-base that will allow the laboratory to observe changes in products (i.e. to spot potential problems signaled by a change in character)

1	Mass Spectrometer	$285K	1

This instrument is more sensitive and specific than the CG/FTIR which is used as a screening instrument. The Mass Spectrometer provides the definitive identification upon which regulatory or legal action be taken against a product.

4	Gas-Chromatographs	$100 (total)	2

These GCs are replacement units for the HQ and San Francisco lab's aging equipment. Gas-Chromatographs are the work-horses of any modern laboratory since they can do such a wide variety of analytical jobs. These instruments, which are in constant use, are in need of replacement.

Mr. **Mrazek**. I would certainly hope that any lack of capability to determine answers to those kinds of questions is something that can be addressed by us through the appropriations process. I hope you do have at least all the physical plant and equipment to conduct the kind of testing and review that is required of you.

In regard to your discovery of the 75 contaminated wines, I understand through your appendix that the ATF conducted 200 special field inspections to sample for DEG and quickly discovered 75 additional wines that were contaminated with DEG. That is a pretty significant amount.

When you do a—when you conduct a process like this, do you go into a store and take a bottle of every foreign wine off the shelf and conduct a test on it?

Mr. **Drake**. No. There is a sampling process. For the one kind of sampling, the market basket sampling there is a scientific random sampling process that was developed. For what we were looking for here, we had names and regions in Germany and Austria and Italy, and we were looking for similar names, similar bottlers, similar regions so we were able to focus more on wines coming from the general region that the first wines came from.

Mr. **Mrazek**. Are you saying you did that because you don't have the capability to test all the wines from these foreign countries that come into the United States?

Mr. **Drake**. That is an awful lot of wine that comes into the country and the ability to test that would be an overwhelming task, I believe.

Mr. **Mrazek**. What you are saying is there may well be potentially other wines that weren't tested that conceivably present a problem?

Mr. **Drake**. That is possible.

Mr. **Mrazek**. Let me clarify for the record in reference to a point, Mr. Chairman, that Mr. Drake brought up in regard to an article in the Wall Street Journal. I am not sure how I characterize the statement in the Wall Street Journal, but in the April 16, 1986, issue, it states that U.S. winemakers can legally use chemicals that help in fermenting and clarifying wine and in stabilizing its color and taste. Some of those commonly used are sulfiting agents, and sorbates which are preservatives and fish glue, which clears the wine.

Have you taken a look at sulfides?

Mr. **Drake**. Yes, sir; we have. We have a notice of proposed rulemaking that is going through the rulemaking process. We are again deferring in a way at least to the FDA. They also have a rulemaking process going through their process. Our target is to be about 30 to 45 days behind them when they come up with a decision, our decision will be totally compatible with their decision.

Mr. **Mrazek**. Is that the only 1 of the 80 chemicals that you have concerns about that are presently utilized in production of domestic wine?

Mr. **Drake**. We have yellow dye No. 5, but I am not sure if that is used in wine or not, but that is allowed to be used on labels if it is labeled so the consumer is alerted to the fact it is there.

I would suspect on the other——

Mr. **Mrazek**. Yellow dye No. 5 is not used in wine though, is it?

Mr. **Drake**. Some wines, it may be. It may be—in some of the flavored, cocktail kinds of wines, it may be used, but not in the dry red or dry white wine.

Mr. **Mrazek**. That is good to know.

Mr. **Barnard**. You better protect what you buy.

Mr. **Mrazek**. In any event, I wanted to clarify that they are legally in use.

Mr. **Drake**. They are legally in use, all of them would have been on the GRAS list, generally recognized as safe, list of the FDA for that purpose.

Mr. **Mrazek**. We can discuss that at a later time.

Thank you very much, Mr. Drake.

Thank you, Mr. Chairman.

Mr. **Horton**. Mr. Chairman, I have one other question.

Mr. **Barnard**. Mr. Horton.

Mr. **Horton**. As I understand it, under the OMB procedures, your testimony was submitted to FDA and was reviewed by them. Did they make any changes or deletions in it?

Mr. **Drake**. OMB, sir?

Mr. **Horton**. No; FDA.

Mr. **Drake**. No; FDA did not. We did that not under OMB procedure. We did that because we work together. FDA and ATF work together. It did have to be submitted to OMB, my testimony had to go through OMB, but not FDA to my knowledge. Our exchange between ATF and FDA was because we worked together.

Mr. **Horton**. Did you submit it to OMB?

Mr. **Drake**. Yes, sir.

Mr. **Horton**. Did they make any changes?

Mr. **Drake**. I believe there were some changes made, yes.

Mr. **Horton**. Can you tell us what those changes were?

Mr. **Drake**. I think most of them were kind of editorial changes.

Mr. **Horton**. Editorial, but not substantive?

Mr. **Drake**. We may have said limited resources and we were asked to put that in as "available" resources, rather than limited.

Mr. **Horton**. What you might call technical changes.

Mr. **Drake**. Yes, sir.

Mr. **Horton**. Nothing in the way of substance?

Mr. **Drake**. Oh, no, nothing.

Mr. **Barnard**. Technical changes?

Mr. **Drake**. Well, yes, not technical, but these were editorial changes that OMB preferred to make.

Mr. **Barnard**. Why would they want to make editorial changes? Why would OMB want to do that?

Mr. **Drake**. You would have to ask OMB, Mr. Chairman.

Mr. **Barnard**. I just can't quite understand that, except are they trying to hide something?

Mr. **Drake**. They did not in the changes they made. Not in the changes they made.

Mr. **Barnard**. But they made editorial changes from the standpoint of whether or not you had limited resources?

Mr. **Drake**. Yes, sir.

Mr. **Barnard**. They are not trying to keep you from accurately testifying as to whether you have adequate resources?

Mr. **Drake**. No, sir.

Mr. **Barnard**. It appears to me they are.

Mr. **Drake**. That wasn't the message I got.

Mr. **Barnard**. Naturally. You work for them. We don't, but we see this all along the line, Mr. Drake. This committee has done hearings on textile imports, steel imports, and now wine imports and here we are. We have a very sad, very sad experience with the number of Customs agents working—very bad experience with the number of Customs agents working in the field trying to help control imports and what happens? They cut down on the number of Customs inspectors. If that is wise use of manpower—I don't see it. So I make that editorial comment.

Thank you.

Mr. **Drake**. I appreciate that.

Mr. **Barnard**. We appreciate having you with us today.

Mr. Drake, if you wouldn't mind, you and your associates, please stick around for a little while. We won't keep you pass your posting out time.

Mr. **Drake**. We don't have one, Mr. Chairman.

Mr. **Barnard**. If you work overtime, we will see that OMB pays you. [Laughter.]

Our next witness will be Mr. John M. Taylor. Mr. Taylor is Director of the Office of Enforcement, Office of the Associate Commissioner for Regulatory Affairs, Food and Drug Administration.

We welcome you to the podium today, Mr. Taylor, and I am sure you would like to identify your two associates, please.

Mr. **Taylor**. On my right is Robert Lake, Acting Director, Office of Compliance, Center for Food Safety and Applied Nutrition, and Curtis Coker, who is also in the Office of Compliance, Center for Food Safety and Applied Nutrition.

Mr. **Barnard**. We welcome you to the witness table today, gentlemen, and we will hear from you at this time, Mr. Taylor.

Mr. **Taylor**. Thank you, Mr. Chairman.

Mr. **Barnard**. Without objection, your entire testimony will be included in the record, and if you care to summarize, we will leave that up to your determination.

STATEMENT OF JOHN M. TAYLOR, DIRECTOR, OFFICE OF ENFORCEMENT, OFFICE OF THE ASSOCIATE COMMISSIONER FOR REGULATORY AFFAIRS, FOOD AND DRUG ADMINISTRATION, PUBLIC HEALTH SERVICE, DEPARTMENT OF HEALTH AND HUMAN SERVICES, ACCOMPANIED BY ROBERT LAKE, ACTING DIRECTOR, OFFICE OF COMPLIANCE, CENTER FOR FOOD SAFETY AND APPLIED NUTRITION, AND CURTIS COKER, OFFICE OF COMPLIANCE, CENTER FOR FOOD SAFETY AND APPLIED NUTRITION

Mr. **Taylor**. Thank you very much, Mr. Chairman and members of the subcommittee. I am here today to discuss with you the role of the Food and Drug Administration [FDA] in the regulation of imported wines. In response to your specific concerns, my testimony will describe the assistance that we have provided to BATF in the removal of imported wines containing the industrial chemical diethylene glycol [DEG] upon discovery of this problem in July 1985.

In summary, FDA provided a health assessment while BATF engaged in a sampling and compliance program—a division of labor reflecting the role that each agency was best equipped to assume under those particular circumstances. FDA's health assessment indicated that while exposure to sufficient amounts of DEG from consuming contaminated wine could have serious health consequences, the actual likelihood of injury was low. Indeed, FDA is not aware of any reports of injury due to this problem.

FDA's responsibilities relating to the contents of wines as well as other alcoholic beverages derives from the fact that they are "foods" under the Federal Food, Drug, and Cosmetic [FDC] Act. From FDA's standpoint, foods such as imported wines may be marketed as long as they are not adulterated or misbranded as these terms are defined by the FDC Act.

One way in which wine may be adulterated is by containing an unapproved food additive. Food additives, which are substances that are intended or expected to become components of food or otherwise affect the characteristics of food, must be approved by FDA before they may be lawfully added to a product such as wine. The presence of an unapproved food additive, such as the use of DEG to sweeten wine, automatically renders a food adulterated.

Under these circumstances, FDA could have monitored incoming shipments of wine and detained those shipments contaminated with DEG. FDA also could have tested on a lot-by-lot basis Austrian wines that had already been imported and seized those lots found to contain DEG. As I will explain below, however, neither of these options could have been exercised as efficiently as BATF's authority under the Federal Alcohol Administration Act.

It is incumbent upon the two agencies, therefore, to work together whenever a problem arises within this area of shared jurisdiction to ensure that their collective resources, both scientific and enforcement-related, are utilized in the most appropriate and effective way to solve the problem. Although no formal or written agreement exists between the two agencies, I am pleased to report that when faced with a problem involving shared jurisdiction, FDA and BATF have been able to divide scientific and enforcement responsibilities and perform their respective roles quickly. Later in my testimony, I will address the factors that govern this relationship and how they have been applied in the case of DEG and in other cases as well.

First, however, I would like to describe briefly FDA's import monitoring problem, its rationale, and the extent to which wines fit into this program. The variety and volume of imported processed foods and raw agricultural commodities that enter the United States every year is quite substantial. FDA conducts an import monitoring program, in addition to its surveillance of domestically produced commodities, that focuses primarily on pesticide residues on raw agricultural commodities. FDA also examines foods for a number of industrial chemicals that have been identified as potential food contaminants.

FDA's monitoring for chemical contaminants in food is geared primarily to detecting a vast array of chemicals that may occur as residues in foods from agricultural use or environmental sources. From a practical standpoint, it would be impossible to test for all chemicals that could possibly be added to food through unscrupulous practices; and, therefore, FDA would not normally monitor for residues of DEG unless there was reason to suspect that the substance might be present.

Although FDA's import testing does not focus on the detection of unapproved food additives, FDA can effectively compel a wine importer to test for such an adulterant through its authority to refuse entry where it has sufficient reason to believe that the wine may be adulterated. The importer has the right to present evidence in such situations to show that a particular shipment is in fact not adulterated. This evidence may be in the form of results of actual testing done by a private laboratory.

FDA could have used this authority in the 1985 situation involving DEG and refused entry to those brands of Austrian wines that FDA had reason to suspect were contaminated. The agency could not have reasonably justified automatic across-the-board detention of all Austrian wines until sufficient evidence was accumulated to indicate a generic Austrian wine problem, especially since the Austrian Government had originally advised us that no wines containing DEG had been exported to the United States.

For imported wines already in commerce in the United States, FDA does not have the authority to stop shipment based on the suspicion of adulteration. Neither does FDA have the authority to require a distributor or retailer to test or analyze wine for a given contaminant. As I previously indicated, FDA could conduct its own testing of samples obtained from the wholesalers and distributors, but such an all-out effort would be extremely resource-intensive and is usually based on a serious public health concern. If FDA had proof that wines in interstate commerce contained an unapproved food additive or were otherwise adulterated within the meaning of the Federal Food, Drug, and Cosmetic Act, FDA could request but not order their removal from commerce. If the wines were not removed, FDA could commence litigation in cooperation with the Department of Justice on a lot-by-lot basis. This type of litigation can be time-consuming and is also only carried out where we have investigational and analytical evidence demonstrating that the specific bottles of wine to be seized actually contain DEG.

BATF and FDA both possess the analytical capability to test wine samples for a number of contaminants; however, FDA has greater experience in analyzing foods for a wide array of diverse chemical contaminants at very low detection levels; that is, parts per billion. Of the two agencies, only FDA has the expertise to assess the toxicological implications of an impurity or the risk it presents to the public health.

The working relationship between the two agencies involves a division of labor that takes these analytical capabilities into account, as well as the differences in the enforcement mechanisms available to each agency. Thus, in situations such as that involving DEG, the nature of the Federal response is dictated by the following kinds of questions:

(a) What is the legal status of the contaminant?

(b) What analytical and toxicological determinations are needed?

(c) What is the most efficient and effective enforcement strategy for the particular problem?

As I stated previously, FDA considers DEG to be an unapproved food additive that was deliberately added to Austrian wines as well as to some Italian and German wines for its sweetening effect. Thus, all wines containing DEG could be removed from domestic commerce regardless of the levels of DEG present or the potential health hazards associated with those levels. The issue for Federal authorities, therefore, was primarily how this removal could be most efficiently accomplished.

BATF, in consultation with FDA, agreed to assume this responsibility because it possesses the analytical capability to test wines for DEG and it has greater leverage to compel compliance through its licensure authority over wholesalers and distributors. FDA has the toxicological expertise and addressed the health issue in order to determine the seriousness of the problem.

The recent discovery of high methanol levels in Italian wines is being handled similarly by the two agencies, although the situation is slightly more complicated because methanol does appear naturally in wine. Methanol that occurs naturally is permissible as long as it is not injurious to health. FDA has recently advised BATF that levels of methanol in wine exceeding the natural background level of 0.1 percent by volume would pose a threat to the health of consumers.

In conclusion, although several occurrences of alcoholic beverage contamination have been discovered in the past several years, we are satisfied that in each situation the Federal response has been quick and adequate for the protection of the public health. We have also found that the relationship between FDA and BATF has worked well and without any confusion. Given the close working relationship between the two agencies, the need for a written agreement between FDA and BATF has not been felt. However, the two agencies are currently exploring the merits of developing a formal agreement to address the division of responsibilities whenever joint jurisdiction is involved.

This concludes my formal testimony and I will be pleased to answer any questions.

Mr. **Barnard**. Thank you very much, Mr. Taylor.

[The prepared statement of Mr. Taylor follows:]

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

STATEMENT

BY

JOHN M. TAYLOR

DIRECTOR, OFFICE OF ENFORCEMENT

OFFICE OF THE ASSOCIATE COMMISSIONER FOR REGULTORY AFFAIRS

FOOD AND DRUG ADMINISTRATION

PUBLIC HEALTH SERVICE

DEPARTMENT OF HEALTH AND HUMAN SERVICES

BEFORE THE

SUBCOMMITTEE ON COMMERCE, CONSUMER, AND MONETARY AFFAIRS

COMMITTEE ON GOVERNMENT OPERATIONS

U.S. HOUSE OF REPRESENTATIVES

MAY 28, 1986

FOR RELEASE ONLY UPON DELIVERY

Mr. Chairman:

I am here today to discuss with you the role of the Food and Drug Administration (FDA) in the regulation of imported wines. Any discussion of our role necessarily focuses on how we work with the Bureau of Alcohol, Tobacco and Firearms (BATF) in the Department of Treasury, the Federal Agency with whom we share jurisdiction in this area.

In response to your specific concerns, my testimony will describe the assistance that we have provided to BATF in the removal of imported wines containing the industrial chemical diethylene glycol (DEG) upon discovery of this problem in July 1985. The adequacy of the Federal response to the discovery of DEG in wines imported from Austria and, to a lesser extent West Germany and Italy, has been the subject of a report by the General Accounting Office issued in March 1986 that provides much of the impetus for this hearing. In summary, FDA provided a health assessment while BATF engaged in a sampling and compliance program--a division of labor reflecting the role that each Agency was best equipped to assume under those particular circumstances. FDA's health assessment indicated that while exposure to sufficient amounts of DEG from consuming contaminated wine could have serious health consequences, the actual likelihood of injury was low. Indeed, FDA is not aware of any reports of injury due to this problem.

FDA's Jurisdiction

FDA's responsibilities relating to the contents of wines as well as other alcoholic beverages derives from the fact that they are "foods" under the Federal Food, Drug, and Cosmetic (FDC) Act. From FDA's standpoint, foods such as imported wines may be marketed as long as they are not adulterated or misbranded as these terms are defined by the FDC Act.

One way in which wine may be adulterated is by containing an unapproved food additive. Food additives, which are substances that are intended or expected to become components of food or otherwise affect the characteristics of food, must be approved by FDA before they may be lawfully added to a product such as wine.

The presence of an unapproved food additive, such as the use of DEG to sweeten wine, automatically renders a food adulterated unless the additive has a status known as GRAS--generally recognized as safe. Since DEG is not GRAS in this country, the FDC Act could be relied upon to prohibit the introduction into interstate commerce of any wine containing DEG in any quantity.

Under these circumstances, FDA could have monitored incoming shipments of wine and detained those shipments contaminated with DEG. FDA also could have tested on a lot-by-lot basis Austrian wines that had already been imported and seized those lots found to contain DEG. As I will explain below, however, neither of these options could be exercised as efficiently as BATF's authority under the Federal Alcohol Administration Act. That Act provides that Agency with authority to take action against wines containing DEG or any other food additives not approved by FDA on the grounds that such wines are improperly labeled and to compel compliance through its licensing authority.

It is incumbent upon the two Agencies, therefore, to work together whenever a problem arises within this area of shared jurisdiction to ensure that their collective resources, both scientific and enforcement-related, are utilized in the most appropriate and effective way to solve the problem. Although no formal written agreement exists between the two Agencies, I am pleased to report that when faced with a problem involving shared jurisdiction, FDA and BATF have been able to divide scientific and enforcement responsibilities and perform their respective roles quickly. Later in my testimony, I will address the factors that govern this relationship and how they have been applied in the case of DEG and in other cases as well.

First, however, I would like to describe briefly FDA's import monitoring program, its rationale, and the extent to which wines fit into this program.

FDA's Import Monitoring

The variety and volume of both imported processed foods and raw agricultural commodities that enter the United States every year is quite substantial. FDA conducts an import monitoring program, in addition to its surveillance of domestically produced commodities, that focuses primarily on pesticide residues on raw agricultural commodities. FDA also examines foods for a number of industrial chemicals that have been identified as potential food contaminants, toxic metals and mold-produced toxins.

On an annual basis, FDA samples and tests approximately 5,000 shipments of imported commodities and processed foods which are collected at ports of entry and analyzed at the Agency's district laboratories. Under the surveillance phase of the program, each FDA field office has primary responsibility for selecting appropriate commodities for random sampling. However, as a general rule in both its domestic and import programs, FDA tests more raw agricultural commodities (e.g., grapes) than processed foods (e.g., wines), because pesticides and other chemical residues tend to degrade, become diluted, or are removed during processing of food. Therefore, in order to utilize its resources most effectively, the Agency has chosen to gear its sampling to those foods which are more likely to contain chemical contaminants. If residues are found in the raw commodity that would be indicative of a possible problem in a processed food, the Agency would intensify its sampling of both the raw and processed food. Prior to the discovery of DEG in imported wines in 1985, however, FDA sampling and analyses of grapes and wine during fiscal years 1982-1985 did not indicate a need to step up our monitoring of these foods. Out of 974 samples of grapes tested (672 imported, 302 domestic) only 5 contained violative pesticide residues. FDA found no violative residues in any of the 53 shipments of wines (20 imported, 33 domestic) that the Agency sampled and analyzed during fiscal years 1982-85.

It should also be emphasized that although FDA employs multiresidue methods to analyze foods for a number of contaminants at one time, FDA cannot examine all foods for all conceivable contaminants. Thus, not only does FDA concentrate its resources on those foods most likely to contain contaminants, but the Agency also looks for those contaminants most likely to be present in food.

FDA's monitoring for chemical contaminants in food is geared primarily to detecting a vast array of chemicals that may occur as residues in foods from agricultural use or environmental sources. From a practical standpoint, it would be impossible to test for all chemicals that could possibly be added to food through unscrupulous practices; and, therefore, FDA would not normally monitor for residues of DEG unless there was reason to suspect that the substance might be present.

Although FDA's import testing does not focus on the detection of unapproved food additives, FDA can effectively compel a wine importer to test for such an adulterant through its authority to refuse entry where it has sufficient reason to believe that the wine may be adulterated. The importer has the right to present evidence in such situations to show that a particular shipment is in fact not adulterated. This evidence may be in the form of results of actual testing done by a private laboratory.

FDA could have used this authority in the 1985 situation involving DEG and refused entry to those brands of Austrian wines that FDA had reason to suspect were contaminated. The Agency could not have reasonably justified automatic across-the-board detention of all Austrian wines until sufficient evidence was accumulated to indicate a generic Austrian wine problem, especially since the Austrian government had originally advised us that no wines containing DEG had been exported to the United States.

Wines Already in Commerce

For imported wines already in commerce in the United States, FDA does not have the authority to stop shipment based on the suspicion of adulteration. Neither does FDA have the authority to require a distributor or retailer to test or analyze wine for a given contaminant. As I previously indicated, FDA could conduct its own testing of samples obtained from the wholesalers and distributors, but such an all-out effort would be extremely resource-intensive and based on a serious public health concern. If FDA had proof that wines in interstate commerce contained an unapproved food additive or were otherwise adulterated within the meaning of the FDC Act, FDA could request but not order their removal from commerce. If the wines were not removed, FDA could commence in rem litigation in cooperation with the Department of Justice on a lot-by-lot basis. This type of litigation can be time consuming and is also only carried out where we have investigational and analytical evidence demonstrating that the specific bottles of wine to be seized actually contain DEG.

By contrast, BATF possesses the capability to request all wholesalers and distributors of imported wines to conduct tests; those that fail to do so face a prompt loss of their license to distribute alcoholic beverages if BATF's followup sampling efforts reveal the presence of contaminated wine in their inventories.

Factors Governing FDA/BATF Relationship

BATF and FDA both possess the analytical capability to test wine samples for a number of contaminants; however, FDA has greater experience in analyzing foods for a wide array of diverse chemical contaminants at very low detection levels (i.e, parts per billion). Of the two Agencies, only FDA has the expertise to assess the toxicological implications of an impurity or the risk it presents to the public health.

The working relationship between the two Agencies involves a division of labor that takes these analytical capabilities into account, as well as the differences in the enforcement mechanisms available to each Agency. Thus, in situations such as that involving DEG, the nature of the Federal response is dictated by the following kinds of questions:

(a) What is the legal status of the contaminant (e.g., unapproved food additive, unavoidable contaminant, etc.)?

(b) What analytical and toxicological determinations are needed?

(c) What is the most efficient and effective enforcement strategy for the particular problem?

Diethylene Glycol (DEG)

As I stated previously, FDA considers DEG to be an unapproved food additive that was deliberately added to Austrian wines as well as to some Italian and German wines for its sweetening effect. Thus, all wines containing DEG could be removed from domestic commerce regardless of the levels of DEG present or the potential health hazards associated with those levels. The issue for Federal authorities, therefore, was primarily how this removal could be most efficiently accomplished.

BATF, in consultation with FDA, agreed to assume this responsibility because it possesses the analytical capability to test wines for DEG and it has greater leverage to compel compliance through its licensure authority over wholesalers and distributors. FDA has the toxicological expertise and addressed the health issue in order to determine the seriousness of the problem. These were the most important factors in determining the Federal regulatory response. A chronology of our activities is appended to this testimony.

FDA's analysis of the hazard posed by DEG in wine is based on both human and animal data. The human data show that acute levels of exposure of about an ounce or more of DEG consumed each day for several days can produce kidney failure leading to death. The animal data suggest that below this level, a maximum acceptable daily intake level does exist where no harm is expected. At certain levels in between, the potential exists for the formation of kidney stones and kidney damage from the consumption of DEG over varying periods of time, depending on the level. However, given the amounts of DEG that have been found, the types of wine involved, and the conservative nature of our estimate of intake necessary to produce harm, we believe it unlikey that any illnesses or deaths have or will occur. And, as I have stated, FDA has not received any reports of illness or injury resulting from this problem.

Methanol

The recent discovery of high methanol levels in Italian wines is being handled similarly by the two Agencies, although the situation is slightly more complicated because methanol does appear naturally in wine. Methanol that occurs naturally is permissable as long as it is not injurious to health. FDA has recently advised BATF that levels of methanol in wine exceeding the natural background level of 0.1 percent by volume would pose a threat to the health of consumers. I will be happy to provide the Subcommittee with the full toxicological evaluation upon which this guidance is based. Methanol levels above the 0.1 percent background level usually indicate improper processing or a deliberate addition of methanol to the wine.

Nitrosamines in Beer

The division of labor between FDA and BATF can differ substantially in other situations because of the unique scientific and enforcement issues involved. On one end of the spectrum, for example, FDA, again in consultation with BATF, assumed full responsibility several years ago for regulating the levels of nitrosamines in beer because FDA was the Agency best equipped to deal with the problem. Nitrosamines are a class of chemicals that includes some known carcinogens. Because they occur as a byproduct of manufacture without being purposefully added, they are not food additives and thus not automatically illegal. Whether their presence renders a product adulterated under our law depends upon their toxicity, or lack of it.

When nitrosamines were first discovered in beer in the late 1970's, we did not know why they were occurring, whether their presence was unavoidable, or how toxic they were at various daily intake levels.

Thus the issues, at least at that point, were primarily scientific.

It was soon determined that nitrosamines are formed during the drying of the sprouted barley malt. Although they cannot be eliminated entirely, they can be reduced to very low levels. Through toxicological analysis, FDA was able to establish an "action level" for nitrosamines that permits insignificant and unavoidable amounts. FDA also assumed responsibility for enforcing these levels, primarily because only FDA possessed the analytical capability to detect them down to the parts per billion level.

Conclusion

Although several occurrences of alcoholic beverage contamination have been discovered in the past several years, we are satisfied that in each situation the Federal response has been quick and adequate for the protection of the public health. We have also found that the relationship between FDA and BATF has worked well and without any confusion. Given the close working relationship between the two Agencies, the need for a written agreement between FDA and BATF has not been felt. However, the two Agencies are currently exploring the merits of developing a formal agreement to address the division of responsibilities whenever joint jurisdiction is involved.

This concludes my formal testimony. I will be pleased to answer any questions that you may have.

CHRONOLOGY OF ACTIVITIES

July 12, 1985 - FDA alerts BATF of DEG in Austrian wine based on State Department telegram.

July 15 - BATF advises FDA it is seeking additional information from Austrian authorities.

- BATF advises FDA that Austrian authorities assure them that no DEG contaminated wine was exported to the United States.

- FDA advises BATF it will analyze toxicological data.

July 17 - BATF alerts FDA that U.S. wine importer had found DEG in his Austrian wine. BATF further advises FDA that it was developing a plan to identify and remove DEG contaminated Austrian wine from U.S. market.

- FDA provides DEG hazard evaluation to BATF

July 18 - FDA and BATF meet and discuss information known on the DEG problem. BATF advises it was initiating action:

  - o to alert the U.S. wine (wholesalers and importers) industry to quarantine all Austrian wines until tested and found free of DEG;
  - o to alert customs to detain all shipments of Austrian wine until tested and found free of DEG; and
  - o to initiate recalls and issue publicity on all Austrian wines found to contain DEG. (John M. Taylor, Director, CFSAN Office of Compliance, FDA) concurs with BATF action plan.

Aug. - Sept. - At BATF request, FDA reviews BATF analytical findings to evaluate quality of confirmation findings. FDA analyzes BATF samples confirming their findings.

Mr. **Barnard**. Mr. Taylor, let me ask you some questions relative to the chronology of activities, set forth in your statement's appendix.

On July 18, you—I mean by that the FDA—concurred with BATF's action plan. What exactly was this action plan? In other words, what did FDA review and concur in?

Mr. **Taylor**. What we did was more or less a conversation of what we were going to do. It was not really, to my knowledge, an actual written document, but rather how we would handle the problem. Mr. Coker might have additional information on that, but it is my understanding that it was more or less a telephone conversation.

Mr. **Coker**. Well, what they proposed doing was, of course, to immediately notify the wholesalers and distributors in the country to stop further shipments of Austrian wine until they had been tested. That was one aspect.

The other aspect was the notification of Customs to detain all entries of Austrian wine.

And the third aspect was to release publicity any time DEG was found in wine.

Mr. **Barnard**. Did you make any recommendations at that time on how they might conduct a nationwide recall and if so, what were they?

Mr. **Taylor**. No, we did not.

Mr. **Barnard**. You did not make any suggestions to them.

The chronology statement also indicates that FDA reviewed BATF's analytical findings in August or September 1985, at the BATF's request. What actually did the FDA review at that time?

Mr. **Taylor**. They sent three of the samples where they had found DEG for us to do some additional analysis and confirmation to make sure that we had DEG present in the products. This was done by mass spectrometry and these results were furnished back to BATF. So it was really a confirmation of results they obtained.

Mr. **Barnard**. What was the FDA opinion of the quality of the findings from BATF?

Mr. **Taylor**. We agreed with what they had found as far as the presence of DEG in the products.

Mr. **Barnard**. You didn't find any problems with that analysis?

Mr. **Taylor**. No.

Mr. **Barnard**. Is the FDA at the present time testing any wines domestically or foreign on a routine and regular basis?

Mr. **Taylor**. Between the period of 1982 to 1985, I think we checked some 52 wines, both domestic and importers. These were primarily checked for pesticides and in some cases for fill.

As far as an unproved food additive, the answer is, no, we are not on a uniform program.

Mr. **Barnard**. So, in other words, the contaminants you are testing for is not in the product itself, but how the product was developed; is that it?

Mr. **Taylor**. Well, the kinds of things we are testing for is maybe pesticide residues. Usually we do that on the grape rather than the wine.

You are asking whether we are testing for additives such as DEG; the answer is, no. One of the problems we have as was pointed out by BATF is there is no way unless we have some type of information that we would be able to test for all the possible illegal chemicals that could be put into wine.

Mr. **Barnard**. So there is no testing of any wine products that come into the country at this time?

Mr. **Taylor**. Not on a routine basis, no.

Mr. **Barnard**. Mr. Taylor, one of the reasons that you give in your testimony for deferring to the BATF is that they had better and more authority than you do for the same cases. And yet in their testimony, they concede that their authority has some very, very big gaps in order to require certain actions and reports. In retrospect, wasn't there some misunderstanding on FDA's part about the extent and amount of BATF's authority?

Mr. **Taylor**. I could say it was probably some misunderstanding on my part, because I was involved heavily in that decision.

Mr. **Barnard**. In that case, shouldn't the FDA have been jointly involved in a regulatory capacity to fill in those gaps?

Mr. **Taylor**. Based upon what we knew at the time, I would say that what we did was primarily what we would do again. However, as I stated in my testimony, we are looking at the whole gamut of things that happened and we will be looking for ways to improve the performance in the future.

Mr. **Barnard**. One of those ways could very possibly be sharing with them experience in a nationwide recall. Did you know that BATF had never conducted a nationwide recall at that time?

Mr. **Taylor**. No, I did not, but one of the problems we have, we do not have recall authority either and we can request a firm to recall but we do not have authority to force them to recall. That was one of the primary things in our decision regarding how would we get back all the wine that was in the domestic commerce.

Mr. **Barnard**. The GAO indicated that the FDA was lacking resources at the time the decision was made to defer to BATF on the DEG contamination, and the FDA staff indicated that this played a role.

Could you give us a better feel for your staffing shortages in FDA offices that conduct tests and undertake recalls?

Mr. **Taylor**. I guess what was really told to the individual from GAO is that at the time of the problem with the DEG in the wine, we had a number of other emergencies. We had the soft cheese problem with Listeria that started in California and spread to some imported cheese, and so forth. At the same time we had the problem with the Aldicarb in watermelons which made a number of individuals ill. So we had two major emergencies on at that time.

Mr. **Barnard**. Mr. Erdreich.

Mr. **Erdreich**. Thank you, Mr. Chairman.

I am trying to get some idea of the reaction that BATF engaged in and not trying to Monday morning quarterback BATF, but I asked a question earlier about the level of risk, the health risk involved.

If I read your testimony on your opening page, you said that FDA provided a health assessment while BATF engaged in a sampling and compliance program.

Then on page 8 you talk about what your assessment is of the health risk of DEG. You say that given the amounts of DEG that have been found, the types of wine involved, et cetera, your estimate of intake necessary to produce harm, you believe it unlikely that an illness has or will occur, and that there has been no report of illness or injury to date.

Looking at chart C, which has been discussed earlier, and noting that less than a gram of DEG in a liter of wine was found in some wines and larger quantities in others—was it your recommendation to BATF that they should recall all wines that had DEG levels? Or that they should just go after those at the high level of contamination or DEG levels?

Mr. TAYLOR. One of the problems with the DEG and what we told BATF is that it is illegal at all levels because it is an unapproved food additive. It is put in there as a sweetening effect. So as far as we are concerned it was illegal in all levels.

As far as you are talking about levels of concern, that is a different story. But it was our position and still is because that is our law, that it is illegal at any level, if we can confirm it is there.

Mr. MRAZEK. Will the gentleman yield?

Mr. ERDREICH. Yes.

Mr. MRAZEK. Mr. Taylor, are you in a position to say that if in certain wines you find nine parts per million [ppm] that has represented an intentional utilization of DEG for sweetening purposes at that level?

Mr. TAYLOR. From what we know at the present time and the information we have there is no background level of DEG in wine. Now, we know that there are levels of methanol in wine, but as far as we know, as far as I know, there is no background level of DEG in wine.

Mr. MRAZEK. My point is this, if you have certain wine producers that put 19,000 ppm DEG in the wine for sweetening effect, I have to believe that if you put nine parts in per million it is not going to have an appreciable effect.

Mr. TAYLOR. The point is well taken, but it shouldn't be there. If a manufacturer runs across a situation of this nature where they are saying they have a background of 9 ppm in their product and it is naturally occurring and they wish to come in and prove it to the agency and if they do it successfully, then at 9 ppm it wouldn't be a health hazard, we would consider that.

Mr. MRAZEK. Thank you.

Mr. ERDREICH. I guess what I am trying to get at and I understand you are saying that it is illegal if there is any amount.

Mr. TAYLOR. If you ask me whether all the levels up there are a health hazard, the answer is no.

Mr. ERDREICH. OK. I appreciate your answer.

I am not trying to raise the question from your agency of what you should or should not have done. I guess I am questioning what BATF did and that I am really concerned about advising the public in press releases generally of a supposed health risk when I am hearing that there apparently was not a health risk at some levels here.

It just seems to me we should have better ways to deal with these problems besides a generalized alert that would elevate people's concerns much beyond the true health risk involved.

What you are doing is perfectly correct. I understand as far as your agency is concerned, as far as the law and requirements, and I am just trying to get a sense of what should be done differently so that we don't alarm the consuming public at large where there is not a health risk. I think that does a disservice as much as it does a service to find contaminants in the products and alert the consumers where there is a health risk.

I think what you did, I understand it is a statutory requirement of your agency.

Mr. **Horton**. Would you yield?

Mr. **Erdreich**. Yes.

Mr. **Horton**. I think you are making a good point. I think there is an inconsistency and perhaps you can explain it.

As I read the testimony, or as I heard the testimony from Mr. Drake, on page 3, this is the context in which he puts this subject. He said,

> We also contacted the Food and Drug Administration, who told us that DEG at high levels posed a more immediate health threat, but that there could be a cumulative effect on the kidney and liver at relatively low levels. The best scientific information available reflects that there is no tolerable level for DEG.

Now, that is different than saying what you said. You said that you have not adopted a policy, so therefore there is no legal basis for it. But they have construed that to say that there is no tolerable level.

And then he goes on:

> This led us to what I believe to be the only rational conclusion. This is the conclusion. That the presence of any amount of DEG in wine posed a potential health threat. Every decision and every step taken flowed from our basic priority of protecting the American consumer.

That is said a little bit different than what you just said.

Mr. **Lake**. Let me help clarify a point about that because I think that may be a source of some confusion.

When we evaluate a petition, say, for a food additive or when we try to establish an action level, we insist on a great deal of data.

In fact, for food additives, we may require considerable testing so that we can determine not only what the acute effects might be on a one-time or short-term basis but also so that we can evaluate long-term effects for continued use over a long period of time.

I think what we were really saying in the case of DEG is, how much would be an immediate hazard? We initially did a search on experiences reported in the literature, past experiences which related really to primarily acute effects.

There was some information about lower levels being a potential hazard over a long period of time, but the FDA has not received any kind of petition to approve DEG and therefore we have not gone through the data requirements, the exercise we would go through in setting a limit for a food additive, such as we did with aspartame where there were nearly 200 studies that we evaluated not only to determine short-term effects but also to determine lifetime exposure and what that would do.

So what we were saying here is that we are not prepared to say that any particular level of DEG is safe. We have not gone through that process.

We did go through a process of making a judgment about roughly the range, based on information in the literature, that might present first an acute hazard and then maybe a little lower range that might present some effects over a longer period of time.

I don't believe we have nearly the kind of data that we would like to have if we were actually going to approve DEG as a food additive and establish a safe level. For that reason, I would in fact disagree with the GAO suggestion that we set an action level. That would be to condone the deliberate addition of DEG at levels below the action level and we are not prepared to do that.

Mr. **Horton**. Just one further question. I think it would be helpful if you could furnish a response for the record. On page 3 of the GAO report, the last paragraph has to do with toxicity and health risk associated with DEG consumption. They go into a whole paragraph about this subject. Could you take a look at that and then give us your thoughts with regard to that particular paragraph? Are they on track or not on track? How does it fit into your thinking and so forth?

I think that would help the committee to resolve this type of problem.

Mr. **Lake**. Yes, sir.

[The information follows:]

The toxicity and health risk associated with relatively short-term exposure to DEG as described on page 8 of our testimony is consistent with the discussion on pages 3 and 4 of the GAO report. [Note: In this context, relatively short-term refers to exposure periods of less than a lifetime. Because the presence of DEG in foods is not unavoidable and it is illegal at any level, lifetime feeding studies in animals have not been conducted for DEG.]

Mr. **Mrazek**. If I could intercede with one question, I would appreciate it.

You made a point of stating a couple times "deliberate addition" of DEG. In the GAO analysis, they say "purposely added DEG." I can understand again that certain Austrian wine manufacturers deliberately added DEG to wine as a sweetener. However, I find it hard to believe that trace elements will have an impact; in fact, I am informed that they have no impact on taste at trace levels.

Is it possible, what should the approach be when in fact it was not a deliberately added element?

Mr. **Lake**. Well, I think again to get back to what Mr. Taylor was saying, it had to be deliberate at some point. Maybe the wine was blended in such a way as to reduce the ultimate concentration where you blend one with high concentrations, perhaps it was used as a processing aid for some other technical effect, and then only with some residual ending up in the wine. I do not know that.

What I do know is that if it is there and it is not naturally occurring, then some human element was involved, either carelessness or otherwise, in its being there. It is simply not allowed for that purpose or for any purpose in wine.

Mr. **Mrazek**. Thank you.

Mr. **Barnard**. Mr. Horton.

Mr. **Horton**. Mr. Chairman, I have some questions, also, that I will submit for the record and I would also make the same statement to you, Mr. Taylor, that I made to Mr. Drake. We are not here trying to hang anybody, hang any agency on the wall like a trophy.

What we are trying to do is make certain that in a positive way we find out how can we solve this problem of making certain that foods, in this case, wine, that is made available to the consuming public is not hazardous to health and that they can use it without any concern or problem.

As a matter of fact, I am sure you are aware of the fact that Dr. Frank Young is a very close personal friend of mine and I personally talked with him. He used to be at the University of Rochester in my district. I knew him before he came down to head up your agency, and I think he is doing an outstanding job, and I know he is very concerned about this whole problem because I have talked with him about it.

One question I wanted to ask was that your testimony on page 4 implies that you evaluated the health risk in choosing your method of testing foods by concentrating on those most likely to contain residues. Don't you think that BATF should have acted similarly in targeting the most highly contaminated wines rather than refusing to establish any priorities in this matter?

Mr. TAYLOR. Based upon what was in the BATF testimony and the impression they got from what we had said regarding health hazards, and we could have done a better job on our original assessment to them, what Mr. Drake assumed we were saying that everything was contaminated to the point at which we required a recall, they acted improperly with the information we had given them.

Mr. HORTON. GAO was somewhat critical of BATF's handling of this matter. Do you disagree with GAO's conclusions in any way?

Mr. TAYLOR. I really cannot say. I really have not looked into everything that happened.

Mr. HORTON. I am just talking about the conclusions.

Mr. TAYLOR. Yes. I think the way the situation was handled between the two agencies, between BATF, and the problem that was involved—I think they did an excellent job.

I disagree with GAO, yes.

Mr. HORTON. What about the future? What are you doing now? Have you transferred your authority? Do you have an agreement with BATF now that they will monitor for contaminants in wine?

Mr. TAYLOR. No. We are studying the problem, as Mr. Drake said. We have had one meeting. I wouldn't want to see anything very rigid. In some instances, it might be a problem where we have the analytical capability and BATF does not. I think we should try to merge the two systems so we can get the best consumer protection possible. That is what we are working for in our deliberation.

Mr. HORTON. What authority do you have and what efforts do you take now to scrutinize and regulate and oversee the American wine industry and wine grape growers?

Mr. TAYLOR. We do have inspections. We have contracts with four States to go in and do the inspections for us in wineries: New York, California, Oregon, and Ohio. We occasionally go in and do analyze wine samples for pesticides and for filth, et cetera.

Mr. HORTON. Thank you very much, Mr. Chairman. I will submit the other questions in writing.

[Mr. Horton's questions and the agency's responses follow:]

QUESTIONS FOR THE RECORD

1) Who decided on behalf of FDA to defer major responsibility for this matter to ATF? In light of the GAO report, if the same circumstances arose today, would you handle the matter differently?

The division of responsibility between BATF and FDA concerning imported wines contaminated with DEG was agreed to by John M. Taylor, who was then the Director, Office of Compliance, Center for Food Safety and Applied Nutrition, on behalf of FDA. If the same circumstances arose today, we would agree to the same division of responsibility for the reasons stated in our written testimony.

2) You testify (on page 2) that FDA could not have acted as efficiently as ATF in this matter. The GAO report was critical of ATF's handling of this matter. Do you disagree with the GAO's conclusions in this regard?

Although we have not scrutinized BATF's activities to the degree that GAO has, we have no reason to be critical of the way in which BATF carried out its activities with regard to DEG.

3) Your testimony (on page 4) implies that you evaluate the health risks in choosing your method of testing foods for contaminants, concentrating on those most likely to contain such residues. Don't you think ATF should have acted similarly in targeting the most highly-contaminated wines, rather than refusing to establish any priorities in this matter?

We believe that BATF acted reasonably in targeting all wines containing DEG, regardless of amount. Even at the highest DEG levels found, the likelihood of harm to an individual is low because of the excessive amounts of wine that probably would have to be consumed over several days in order to produce a serious toxicologic reaction. At lesser DEG levels, steady heavy consumption over much longer periods of time probably would be needed to cause harm. For these reasons, we do not think that

BATF acted improperly by striving to remove all wines containing DEG without prioritizing among such wines, especially since DEG is illegal in any amount.

4) You testified that ATF can withdraw the license of any wholesaler who fails to report their findings of tests of possible contaminated wines.(Page 6) Yet GAO reports only 26 out of at least 175 importers even reported their findings. Do you know of any ATF action to suspend licenses of any of the others?

No.

5) You indicate that on July 17, 1985, you provided BATF with a DEG hazard evaluation. Was this evaluation in writing? If so, please make a copy available. Did you provide this information to GAO? Their report is critical of BATF for not obtaining such an evaluation. Can you account for this discrepancy? Did you provide a copy of this evaluation to GAO since their report was published?

Because we were anxious to respond to BATF quickly, the DEG health hazard evaluation that we provided to BATF at that time consisted of material prepared for internal FDA use coupled with numerous telephone conversations between FDA and BATF staff. These communications, both written and oral, continued into August. The written documentation is submitted for the record.

We provided the written toxicological information on DEG to GAO before their report was published. Because GAO had this FDA-prepared information and included its findings in their report, we cannot explain why GAO would criticize BATF for not obtaining such an evaluation. (Attached)

6) What is your opinion as to the best way to assure that contaminated wines that could represent a public health hazard are identified and removed from the market?

We believe that the present system is fundamentally sound. We have no major changes to recommend.

Attachment to Question No. 5

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Memorandum

Date August 8, 1985

From Chief, Standards and Monitoring Branch (HFF-156)

Subject Additional Information on Diethylene Glycol - Wines (your IAR - 8/2/85)

To Ms. Sonia Delgado
Division of Regulatory Guidance (HFF-314)

As per our telephone conversation today, further to my memo of August 6, we present brief specific answers to assist in your reply to several of the points raised in telegram of Embassy Vienna, Austria to Dept. of State.

"4. Are there tolerance levels and for thresholds regarding chronic or acute consumption of DG in humans?"

There are no tolerances. DEG is not allowed for direct addition to food. Where it may be a contaminant in a food additive, e.g. Polyethylene Glycol, the Food Chemicals Codex sets a specification maximum limit of not more than 0.25% ethylene glycol and diethylene glycol, individually or combined. At the use levels of Polyethylene Glycols, the exposure to DEG would be very low.

"5. Has intoxication with DG ever occurred in the US?"

Yes! In the 1938 sulfanilamide elixir episode, a number of deaths and injuries occurred as a result of patients consuming the elixir which used DEG as the solvent and vehicle. The DEG caused oxalate crystals in the kidneys and severe kidney damage. 25 ml DEG or above was fatal in humans in about 30% of the cases of injury.

"6. Are data available of toxicological animal tests with DG?"

Yes. Studies done in rats show oxalate crystals in urine at .4% & 2% DEG in the diet for 225 days, oxalate excretion in urine at 0.17% of diet, and a no-effect level at only 0.085 of the diet (about 50 mg DEG per kg b.w. of rats). Another study in rats for 2 years showed bladder stones at 1% and bladder tumors and stones at 2% and 4% DEG in the diet.

Direct extrapolation with no margins of safety or safety factor applied would mean a minimum toxic effect (increased oxalate excretion) may be seen at 6 gm DEG/day, and oxalate crystals in kidney may be seen at 12 gm DEG/day. However, the human may be more susceptible to toxicity to DEG than other species based on the fatalities seen at 25 ml DEG or above and pathological findings from the 1938 sulfanilamide elixir episode.

The maximum acceptable daily intake (ADI) based on a no-effect level of 0.085% in rats, applying a 500-fold safety factor (because only a 225 day study and one species), would be about 6 mg DEG for a 60 kg person.

"7. Any additional information on DG would be highly appreciated."

With my August 6, 1985 memo, have supplied you with a package of data and information and literature references on DEG toxicity.

Charles J. Kokoski, Ph.D.

HFF-100 (Flamm)
HFF-150 (Blumenthal)
HFF-152 (Edwards, Shibko)
HFF-156
HFF-334
HFF-458

CJKokoski:mw:R/D:8/8/85:HFF-156:472-5767
F/T:8/13/85:Doc#125:Disk#WALL19

July 12, 1985

Diethylene Glycol (DEG) Toxicity

Animals:

Gaunt et al. study - Rats, 225 days, dietary.

- Oxalate Crystals in urine seen at .4% & 2%
- Oxalate Excretion in urine -

  Minumum Effect Level (MEL) at 0.17%
- No-effect Level (NEL) at 0.085% (about 50 mg/kg b.w.)

Fitzhugh & Nelson - Rats, 2 years, dietary

- Bladder stones at 1%
- Bladder tumors & bladder stones at 2% & 4%

Humans:

Calvary & Klumpp - (1939) Case studies of 1938 Sulfanilamide Elixir episode.

25 ml DEG or above was fatal in humans in about 30% of the cases.

Extrapolation of DEG Toxicity to Humans:

- ADI (maximum acceptable daily intake) based on NEL of 0.085%, applying a 500-fold safety factor (because only 225 day study and one species), and for a 60 kg person is about 6 mg DEG.
- If one extrapolates directly from rat to a 60 kg man (using no safety factor), DEG is toxic to humans as follows:

- Minimum toxic effect (increased oxalate excretion) may be seen at 6 gm DEG/day (about 5.5 ml).
- Oxylate crystals may be seen at about 12 gm DEG/day (about 11 ml).

- Calvery and Klumpp stated (1939) that man may be more susceptible than other species, which may make above levels of DEG even more toxic to humans. Their opinion was based on 25 ml of DEG being fatal in some people and on the pathological findings from the 1938 sulfanilamide elixir episode.

Diethylene Glycol is not allowed as a direct food additive in 21 CFR Food Additive Regulations. It may occur as a contaminant limited to low levels in some ethylene oxide condensates (e.g. polyethylene glycol) used as food additives. However, any purposefully added DEG to food is not authorized by the regulations and any such imported food would be considered illegal.

Charles J. Kokoski, HFF-156

Mr. Barnard. Mr. Taylor, likewise—in our letter of invitation of April 16, we included a couple of questions on page 3 of our letter which FDA did not answer. I would appreciate it if you all would. It is question 8, the FDA's assessment of BATF's sampling, testing, removal procedures and recommendations for changes. If you would submit those, we would appreciate it very much.

[The information follows:]

RESPONSE TO QUESTION 8 IN SUBCOMMITTEE'S LETTER OF INVITATION
DATED APRIL 16, 1986

8. FDA's Assessment of BATF's sampling, testing, and removal procedures and recommendations for changes:

a. Pursuant to the GAO's recommendations (made in the context of future FDA-BATF consultations), please determine and report to the subcommittee whether the actions taken by BATF in sampling, testing, and removing contaminated wines from the marketplace were adequate, in FDA's view, to protect the public health and safety.

The existence of DEG in imported wines presented a problem that clearly warranted a Federal response, but did not pose a serious public health emergency. It appears to us that BATF's activities under the circumstances were adequate to protect the public health and safety. As we testified, we know of no injuries or deaths in the United States that have been attributed to DEG in imported wines.

b. Also, pursuant to GAO's recommendation, please suggest appropriate policies and procedures which BATF should consider implementing to redress any deficiencies at any stage. (Recent information developed by the subcommittee indicates that BATF still lacks a followup system to verify sufficient testing and adequate removal of the methanol contaminated wines.)

We have no suggestions at this time, but as we testified, the two agencies are exploring the merits of developing a formal agreement to address the responsibilities of each agency whenever joint jurisdiction is involved. During the course of these discussions, the two agencies will review their past responses to contamination problems in alcoholic beverages and the GAO report findings to determine if changes are needed.

Mr. **Barnard**. Mr. Taylor, thank you very much for your witnessing today. I am sure you have provided very important information for our hearing. Thank you very much.

Our next witnesses will be a panel: Mr. John Martini, who represents the New York Wine Council; and Mr. Richard H. Naylor, the Wine Grape Growers of America.

I might state to the others we asked to stay, we have no further need of the previous witnesses, if you feel inclined to leave this very exciting testimony.

Mr. Martini, we appreciate you and Mr. Naylor for being with us today. It will be interesting to complete this study to know what the American wine producers have to do to comply with the regulations. So, we will hear from you, Mr. Martini, first, and then Mr. Naylor. Your entire testimony will be included in the record in the event you would like to summarize.

STATEMENT OF JOHN H. MARTINI, PRESIDENT, NEW YORK STATE WINE GRAPE GROWERS, INC.

Mr. **Martini**. Thank you, sir. I will try to go quickly.

My name is John Martini, and I am a farmer, a grower of grapes and other fruit, on a farm that I share with my wife and children in the Finger Lakes region of New York State. I also serve as president of the New York State Wine Grape Growers, Inc. I was employed at the New York Agricultural Experiment Station in Geneva, NY, for 9 years, working in the analytical section of the food science department. I am here today to tell the committee what I have to do as a grape farmer to assure that the American consumer receives high quality fruit and wines, free from contaminating spray materials.

There was a time, unfortunately, when spray materials were applied almost willy-nilly. If some was good, then lots was better. Times have changed: We became aware of the effects that even minute amounts of chemicals can have on the lifecycles of beneficial organisms as well as those we sought to eradicate. We also became more acutely aware of the effect these residues might have on the human organism. State and Federal agencies sought to balance the consumer demand for low cost, blemishless fruits, and vegetables with the health concerns that chemical residues might present to those consumers.

In New York, I am required to register and be tested for a permit to buy the chemicals that I might use on my farm. The same scenario takes place in other States, as well. We use training manuals—I brought one with me. I don't have this memorized, and I don't think any farmer does. It provides us information, and we use these training manuals to cover all aspects of the use and disposal of pesticides. We are tested on the contents of these manuals. The test is what you might consider an open book test. Upon satisfactory——

Mr. **Barnard**. Is that State or Federal, Mr. Martini?

Mr. **Martini**. This is State. For my State permit, I have it. I am not sure what the Federal extent is. It does come through the EPA.

Mr. **Barnard**. Of course, the FDA recognizes the State of New York, California, and others. That is an effort on the part of the State?

Mr. **Martini**. This is an effort on the part of the State, supported by the Federal—EPA, I believe.

We receive the appropriate permit for the crops we raise. If I take this test, and I grow grapes and fruit, it doesn't give me a permit to use chemicals on corn and oats or beef and pigs. I would have to take another series of tests to get a permit to use chemicals there. Every 3 years, our permit has to be renewed; and every 6 years we are retested and recertified. The permit does not allow us to spray as we please and use materials at our whim. By law, it is illegal to use a pesticide for uses other than those stated on the label.

I have a sample label from a herbicide here. It has instructions where we can use it, where we can't. Label instructions also provide methods of container disposal, relative toxicity, compatible materials and dosage rates for various conditions. Another part of label recommendations stipulates days-to-harvest time periods which restrict application of those materials if the crop will be harvested before the time period allows.

The companies that produce the spray materials we use must spend considerable sums of money to get their products approved for use on a particular crop. If it is considered safe on apples, that does not give the material an approval for use on grapes. As users of pesticides, we are responsible for the effects that they may have on our neighbor's crops, and we must keep records of what and how much we use and when we use it.

We talked about the records BATF requires of processors. In theory, it is possible to trace a contaminated product if it does exist in a domestic wine—to my knowledge, none has ever existed—back to the grapes and vineyard they were raised in. Here is a sample of my 1983 chemical spray sheets, the amount, the blocks I sprayed them on.

The State agricultural colleges and cooperative extension provide information on recommended materials and dosages for pests that might be a problem in producing good quality fruit. There was a time when most growers sprayed on a schedule. This was done because most materials we use are considered protective rather than eradicative. For example, the presence of sulfur powder on the foliage and fruit of the grape can prevent powdery mildew; once powdery mildew starts, no amount of sulfur will serve to eradicate it. Because of safety and economics, more growers are now applying chemicals on the basis of need. Insects can be monitored and sprays applied if they seem to be getting out of hand.

Integrated pest management is a federally funded program to encourage the use of a multipronged attack on the pests that would destroy our crops. These include not only chemical means but also biological and cultural practices. It also means that we may accept some damage in our crops in an effort to reduce residues. It is not cheaper, but it is safer. Unfortunately, the IPM program apparently will be dropped this year because of Federal budget cutbacks.

The EPA, and in New York the department of environmental conservation, constantly monitor the chemicals we are allowed to use; and when the evidence warrants it, certain spray materials may lose their registration. This Sunday's New York Times—May 25, 1986—carried an article that listed 15 commonly used materials that are subject to review for possible elimination or restriction in their usage.

All the programs are carried out to effect the best possible balance between public safety and quality products for our tables. I personally applaud the efforts—and I think most farmers agree with me—to provide safe goods. We are consumers. But we must all recognize that safety costs—as we lose materials to protect our crops, the prices of the remaining pesticides go up.

Manufacturers spend tremendous sums to prove the safety and efficacy of their product to the EPA. As farmers, we pay for those costs in purchasing the spray materials recommended for our crops. The costs of producing safe, clean foods on domestic farms rises, as does the price of foods on American tables.

As a farmer, complying with the regulations existent in the United States, I am concerned about two aspects of imported wines and food products. In 1985, the United States imported over 7 million gallons of grape concentrate, the bulk of it from South American countries; and we also imported over 45 million 9-liter cases of wine. That amounts to over 700,000 tons of grapes—which were not subjected to the same regulations as our products. In fact, they use chemicals we haven't seen yet and/or chemicals that were explicitly banned years ago, such as DDT. This allows them an economic edge because chemicals they use can return larger crops with cheaper input costs. As a result, imported fruits, vegetables, and juice concentrates flood our domestic market—putting American farmers out of business.

The key issue comes down to this: If the American consumer is to be protected from unwanted residues from spray materials on domestic products, why is he or she not likewise protected from unwanted spray residues on imported foodstuffs? We appreciate the protection and safety that is encouraged by the EPA and State agencies—for it protects not only the consumer, but us as users of pesticides. Their programs have increased the awareness and concern on the part of growers for the benefits and dangers associated with the use of chemical crop protectants. But, as I have said, there are costs that must be borne by domestic growers that are not necessarily borne by foreign producers which puts them at an economic advantage. If the consumer is to be protected from spray residues and questionable chemicals, they should be protected across the board and have some assurance that imported products do not use chemicals that we cannot use. We lose farms and farmers to cheap imports while we apparently abrogate our responsibility to the consumer to provide the same level of safety for both domestic and imported foods.

Thank you for your time and concern.

Mr. **Barnard**. Thank you, Mr. Martini.

Mr. Naylor.

STATEMENT OF RICHARD H. NAYLOR, PRESIDENT, NAYLOR WINE CELLARS, ON BEHALF OF THE WINE GRAPE GROWERS OF AMERICA

Mr. **Naylor**. Thank you.

I am pleased to appear before you today on behalf of the Wine Grape Growers of America. My name is Richard H. Naylor, president of Naylor Wine Cellars, a grower and wine producer in York County, PA, president of Pennsylvania Wine Association, active member in Southeast Pennsylvania Grape Growers Association and Pennsylvania Grape Industry Association. My discussion today will deal more with wine involvement. I am also a grape grower, like John here; but, since he covered that so well, I will direct my thoughts to the winemaking aspect.

My involvement with regulations and standards began when we applied for our license to operate a limited winery in Pennsylvania. The ATF requires a winery to obtain and use various lab equipment to monitor alcohol, additives, and other factors which help ensure the quality standards. We are required to maintain up-to-date records for about 20 items that are pertinent to quality and control.

Some of these are: Tank and barrel logs which follow each wine as it passes from tank to tank and barrel to barrel. A chemical log which shows all chemicals purchased and inventoried and a detailed record when these chemicals are used in wine production. Each wine is logged from the time the grapes enter the winery until the wine is bottled and sold. This log shows each step in the winemaking process, including sugar additions, chemical additions, et cetera. Logs are also required for juice purchases and use, sugar purchases and use, and others. All this data must be available to be reviewed at any time an ATF representative wishes to visit our premises.

The Pennsylvania LCB also inspects at the time of licensing for many of the same things and requires, as does ATF, to monthly submit a total of six reports, showing inventory of bulk and bottled goods, sugar, juice, grapes, shipments, and other items of control. During the periodic visits of the ATF and Pennsylvania LCB, random samples of wine are collected and sent to their laboratories for analysis.

We also have regular visits by the FDA who monitor the cleanliness of our establishment, as well as compliance with water sanitation, and working conditions.

A fourth inspection is made by the Pennsylvania Department of Labor and Industry which monitors safety of the equipment being used, working conditions of the employees, and other aspects of the industrial environment.

I hope that my testimony has given you an insight into the regulations and careful monitoring that each Pennsylvania winery, and I am sure each American winery, is required to comply.

Thank you for the privilege to speak to you today.

Mr. **Barnard**. Mr. Naylor, are you permitted to put methanol in your wine?

Mr. **Naylor**. No, sir.

Mr. **Barnard**. Mr. Martini, what about in your case in New York? Does New York permit any methanol?

Mr. **Martini**. No, sir. Methanol is not permitted. I believe, as was mentioned earlier, it is a background product in natural fermentation. No addition is permitted.

Mr. **Barnard**. Of course, I didn't ask about DEG. I know that is not permitted at all.

Mr. Naylor, do you do any exporting of your wine products?

Mr. **Naylor**. No, sir. At the present time, I only sell my wine within the regional area of my winery, although I have shipped wine into Washington, DC, on occasion.

Mr. **Barnard**. That could be an export.

Mr. **Naylor**. I anticipate making arrangements with a broker in New Jersey in the near future.

Mr. **Barnard**. What about you, Mr. Martini? Do you have any experience in exporting wine?

Mr. **Martini**. Not me personally.

Mr. **Barnard**. I am trying to arrive at what type of inspections any other countries make as far as American wines. I doubt if we ship much wine.

Mr. **Martini**. We don't, sir.

Mr. **Barnard**. Probably don't have any left over to ship.

Mr. **Martini**. We have it left over, but we have a hard time going in the other direction. It is a coals to Newcastle situation. Although I am not familiar with it, I believe there are stiffer regulations in the other direction.

Mr. **Barnard**. Have your associations ever made any studies of the growing of grapes in foreign countries?

Mr. **Martini**. No, sir.

Mr. **Barnard**. So you are not acquainted with any practices abroad that would not be in keeping with American standards?

Mr. **Martini**. Not directly familiar; no, sir.

Mr. **Barnard**. Mr. Naylor.

Mr. **Naylor**. I visited Germany and France several times. I know the Germans have standards for quality levels on their wines, but it is basically the amount of sugar and acid in the wine—not chemical additives. They grade the wines like Kabinett, Auslese, Spatlese, and so forth, based on the quality of wines at harvest. They do have a monitoring system in Germany. I am not familiar with other countries.

Mr. **Barnard**. Mr. Martini, do you know what we are doing in this country as far as the grape product itself? Not the wine necessarily, but just the actual grapes and the raw product that would go into a wine or other uses of the fruits in this country?

Mr. **Martini**. We have to, as I said, follow fairly strict requirements as to what chemicals we use and when we use them and how—spray materials. There are days-to-harvest regulations on various chemicals. The grapes themselves are inspected.

I believe the FDA does a random sampling. USDA does insect and grading-type activities. There are my spray records as a grape grower, my spray records are sent to the winery. They have to have a record of them legally to know what I sprayed. I could lie, but I don't. I don't think anybody else does, either. They are sent in. I know the wineries themselves have checked vineyards' spray records; and if they see something unusual in the vineyard that might indicate the use of a nonregistered chemical, they have rejected those grapes. They will not use them because of fear of contamination that would cause a problem.

Mr. **Barnard**. Mr. Erdreich.

Mr. **Erdreich**. Thank you, Mr. Chairman. I don't think I have any direct questions.

I just want to recall, though, that—I think it was one of the GAO witnesses—I asked the question about regulation abroad versus here. You, Mr. Martini, mentioned some sort of regulations, but otherwise you go through your activities without regulations.

I think it was the GAO witness that said to my question that his understanding from his knowledge of regulations was some foreign countries had even more stringent regulations than America. I think it is probably a mix of a level of regulatory requirements as far as the safety and health that we are all concerned about.

If need be, Mr. Chairman, from hearing the testimony here, it might be a value either from GAO, FDA, BATF, that we get some sort of understanding of what are indeed regulations abroad as well as here and compare them—beyond what we are doing here today, of course. Just look at them with what BATF has done, and what FDA is doing in this instance.

I have no questions, Mr. Chairman.

Mr. **Barnard**. Mr. Horton.

Mr. **Horton**. I have no questions, Mr. Chairman.

I want to thank both Mr. Naylor and Mr. Martini for taking the time to come and testify on this very important matter. I know it is of deep concern to you folks. I think it is important for us to understand the regulation that we have with regard to American wines and grapes; and, as was suggested, I think it would be helpful if we had some comparison toward what we require and what other nations require with regard to wines that come into this country.

I thank you both for being here.

Mr. **Barnard**. Mr. Naylor, do you feel that the wine producers in this country are being treated unfairly with all of the inspections and procedures that you undergo while the imported wines seemingly are tested, it is so haphazard that it is not adequate—do you think the American wine producers are being treated unfairly?

Mr. **Naylor**. No. I don't think we are being treated unfairly. I was pondering on that while Mr. Horton was talking.

The problem is on the other side of the ocean. I think the ability to have these contaminants in American wine is very difficult due to the monitoring and testing done by ATF and FDA. The opportunity to do it over there is a lot easier. I think there ought to be some controls on the European and other wines from South America, et cetera, to prevent contaminated wines from entering our country.

Mr. **Barnard**. So, in other words, you operate under one set of regulations; they operate under another set, or none at all?

Mr. **Naylor**. Right.

Mr. **Barnard**. Wouldn't you say that was unfair?

Mr. **Naylor**. I would say that is unfair.

Mr. **Barnard**. It is unhealthy then? It is not in keeping with the public health?

Mr. **Naylor**. That is correct. But the BATF has always been very tolerant of us at times when we slipped up. They have reminded us and sent us lists of our failures that don't meet their requirements. They follow up to see we correct our situation. As long as we know what we have to do, we work within those parameters.

Mr. **Barnard**. Are you confused at all that ATF has one responsibility and FDA another?

Mr. **Naylor**. We take precedent with the BATF. The FDA, as far as we are concerned, only concerns themselves with water sanitation and cleanliness in the plant. The BATF is more involved with monitoring wines than the FDA.

Mr. **Barnard**. Mr. Mrazek.

Mr. **Mrazek**. Thank you, Mr. Chairman.

I would just like to add my thanks to you for holding the hearings on this important subject, and to also indicate that I fully share the view of my good friend, Congressman Frank Horton, and Ben Erdreich, in suggesting that although many questions have been raised about the regulations in other countries, we really weren't provided with any specific answers by any of the panelists. And I think it would be very constructive to build a record of what the comparative regulations are in some of those countries, because some of them certainly may not have adequate controls over their industry, and yet others we were informed today may have as strict or stricter standards in certain respects than the standards that apply to wine growers and manufacturers in this country.

I think it would be very helpful in terms of trying to determine whether this administration has to seek stronger cooperation from our allies on this question from those countries where they do not have adequate regulations, and perhaps establish stronger standards with those countries that are not willing to provide the structure and mechanism to protect the safety of their own people, and obviously not the United States, either.

Again, I thank you, Mr. Chairman.

Mr. **Barnard**. Well, I thank all of you for being here today. I know you made an extra effort to be here. Some traveled from foreign lands to be here.

Mr. Mrazek, you may have, too, coming from Long Island.

Mr. **Mrazek**. New York.

Mr. **Barnard**. It has been a very interesting hearing, and we will certainly look forward to further information responding to questions to the panelists that appeared before us.

I think we have come through a very interesting experience, and I am delighted as of now we know of no catastrophes that have taken place, allegedly, no deaths, no confirmed illnesses. But, at the same time, I think we have got some real gaps and we have some real problems in some areas in testing the quantity and quality of our products, especially as it has to do with the DEG. I am a little concerned about that. I think we have some tuning up to do with our bureaus, both the ATF and the FDA, in that regard. I don't mean to the degree we are going to be extremists; that is not the point at all. But we do have our obligation to maintain in our products the safety of human health. So, I think we will certainly look forward to some reevaluation.

Mr. Naylor, Mr. Martini, we appreciate your being here today and the contribution you made to these hearings.

With that, the subcommittee is adjourned.

[Whereupon, at 4:15 p.m., the subcommittee adjourned, to reconvene subject to the call of the Chair.]

APPENDIXES

Appendix 1.—Subcommittee's June 13, 1986, Followup Letter to BAFT and BAFT's July 11, 1986, Responses and Relevant Material

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JOHN M. SPRATT, JR., SOUTH CAROLINA
JOE KOLTER, PENNSYLVANIA
BEN ERDREICH, ALABAMA
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NINETY-NINTH CONGRESS
Congress of the United States
House of Representatives
COMMERCE, CONSUMER, AND MONETARY AFFAIRS
SUBCOMMITTEE
OF THE
COMMITTEE ON GOVERNMENT OPERATIONS
RAYBURN HOUSE OFFICE BUILDING, ROOM B-377
WASHINGTON, DC 20515

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MAJORITY—(202) 225-4407

June 13, 1986

Mr. William T. Drake
Deputy Director
Bureau of Alcohol, Tobacco, and Firearms
U.S. Department of the Treasury
Washington, D.C. 20226

Dear Mr. Drake:

During your appearance at the subcommittee's May 28th hearing, I was unable to ask all of the questions which I wanted to pose. Moreover, BATF's testimony raised additional issues. Accordingly, to complete the record, would you please respond to the following questions, by July 3, 1986, if at all possible:

A. Status report on recent identification and removal of DEG contaminated wines

1. Please provide a comprehensive list of contaminated wines identified since January 31, 1986, (the cut-off date in the GAO report) to the present. Please list the wines by nationality and show as to each the DEG level and the approximate date of testing or DEG discovery.

2. At present, are there any wines being tested for DEG? If so, indicate the nationality of the wines and the number of samples or brands.

3. During your appearance you indicated that BATF is continuing to find Austrian wine on retailer shelves and that BATF had narrowed its spot checks to about 6,000 retailers. (p.74 of unedited transcript.) We would like information on BATF's discovery on retailer shelves of (a) any Austrian wines which had not been tested at time of discovery (and of these, the number of wines found to be contaminated) and (b) wines (whether Austrian, German, or Italian) previously tested and determined to contain DEG, since January 31st to the present. For each of the above categories, indicate and list the numbers of brands and bottles/cases per each entity involved, the type of entity and general geographic location, the approximate date, and any actions taken to track down bottles/cases of the same brand elsewhere. Indicate how BATF narrowed to 6,000 the number of retailers carrying Austrian wine.

4. What actions are wholesalers and importers of wines found to be contaminated expected to take to re-export or destroy these wines? Is there any BATF monitoring of such actions? (If so, please describe it.)

B. Alleged violations and BATF compliance and enforcement activity

1. (a) Please furnish information on possible or alleged violations of law and on BATF compliance/enforcement activity, arising out of the DEG contamination of imported wines, including for each category of alleged violations (such as failure to submit test reports or samples, etc.) the numbers and types of both investigations and enforcement actions/orders (including suspension and revocation). (b) Please furnish similar information on compliance activity arising out of the recent methanol contamination.

2. The Michigan importer of the wine with the highest DEG contamination, a 1982 Austrian wine (#50 on BATF's list), told GAO staff that it never carried that wine or 3 of 4 Austrian wines shown to be contaminated, although this importer was listed as the original importer for these wines in BATF records and its name was found on the label of the sampled wine containing the highest level of DEG. This raises serious questions, such as, where are bottles of this wine located, which importer carries this wine (and why does the importer whose name is on the label deny carrying it), and are there cases of this (and the 3 other wines) still in warehouses or on retailer shelves? Please respond to the above questions and indicate BATF's efforts to track these wines.

3. GAO developed information that BATF regional/field staff had serious problems with an Illinois importer of 17 of the 54 contaminated Austrian wines (including 2 of the most 5 most contaminated wines), and several German wines, because they allegedly failed to remove contaminated wines or were otherwise noncooperative. (A knowledgeable third party contacted the subcommittee and generally confirmed compliance problems with this importer.) Please indicate (a) the potential violations which BATF has found involving this importer (and the numbers and amounts of wines involved) and (b) the present status of any compliance activity.

4. How many importer and wholesaler licenses has BATF (a) suspended or (b) revoked in each of the last 10 years, prior to July 1985 (the DEG situation), and for what reasons?

C. Information on illnesses and deaths

You testified that "there has not been one confirmed report of any death or illness in the United States resulting from DEG-contaminated wines." Respond to the following questions arising from this assertion:

1. a. Have there been any unconfirmed reports of death or illness in the United States?

   b. Have there been any reports (confirmed or not) of deaths or illnesses in Europe?

2. Did BATF or FDA actively solicit illness or death reports from the public after describing possible symptoms? If so, please furnish relevant BATF statements/material.

3. Does BATF possess any documentation (irrespective of source, including FDA) showing that no illness or injuries resulted (as opposed to the absence of any such information)? If so, please provide it.

D. Discrepancies concerning (1) the number of on-site BATF field inspections and (2) the existence of a master list of contaminated wines

1. You testified before the subcommittee (p. 6 of statement) that BATF did "hundreds of on-site inspections." Yet, page 13 of the attachment to your testimony states: "...our inspectors have visited thousands of retail establishments nationwide to determine if contaminated wines were being sold." Please resolve this discrepancy, and furnish to the subcommittee a precise number of on-site inspections of retailers, wholesalers, and importers, a separate figure for each category, if one is available. (If precise information cannot be given, indicate how the final estimate was arrived at.)

2. Page 10 of BATF's testimony asserts that GAO's finding on the lack within BATF of a master list of contaminated wines (prior to GAO's request for one) was "erroneous". In view of GAO's repeated assertions at the hearing that BATF was unable to provide such a list until December 1985, please furnish to the subcommittee a copy of the list that pre-existed GAO's request and indicate, if known, the person/offices(including BATF regional or field staff)/entities receiving that list. If such a list did exist, then why did BATF not furnish it to GAO when they first requested it?

E. Adequacy of BATF's testing and laboratory resources and testing protocols

Information developed at the hearing indicates that BATF needs additional laboratory resources for testing wines and better testing protocols. Please specify (i) the additional testing equipment and the types and numbers of laboratory personnel needed, estimating the annual costs of such, and (ii) the improved testing protocols being considered for random testing.

F. Ambiguity as to how BATF handled the identification of methanol contaminated wines differently than that for the DEG contaminated wines

Page 15 of BATF's testimony states that the only difference in the procedures and policies in these two contamination situations is the "paper trail" which BATF apparently maintained for the methanol contamination. Yet, on page 97 of the unedited hearing transcript (and also elsewhere), you testified that BATF "operated even more effectively because we learned from the first time out...." Please specify exactly what BATF did differently in response to the methanol situation, even if these differences were limited to the maintenance of additional documentation. (In that case, what additional documentation did BATF keep, and what does it show?)

G. Information about foreign government standards for wine and their policies and procedures for testing for contaminants, and international wine organizations

1. There were several inquiries during the hearing about the standards foreign wines imported into the United States are subjected to by home country governments. Would you please (a) summarize those standards and also (b) describe the procedures for testing for contaminants, followed by the governments of the 10 countries exporting the most wine to the United States, to the extent that this information is readily available? And, in the case of West Germany (FDR), Austria, and Italy, indicate the actions each government took to remove wines contaminated with DEG or methanol.

2. a. Please describe the activities of the OIB (apparently the international organization of government bodies regulating wine), as they relate to identifying and removing contaminated wines.

b. Would that organization be useful in developing an improved intelligence gathering system, as you suggested during your testimony, and, if so, how? If not, what system could be used by BATF?

II. Information requested by Congressman Frank Horton

1. On p. 88 of the unedited transcript of the hearing, Congressman Horton asked for BATF's analysis of its existing legal authorities and the possible need for additional authorities including additional legislation. In your analysis, please indicate whether BATF intends to implement the two missing regulations referenced on pages 68 and 73 of the hearing transcript.

2. At the end of the hearing, Congressman Horton asked for BATF's responses to additional questions. (For your convenience, an additional copy is enclosed.) The first question deals with the discrepancy between your testimony and GAO's findings as to whether BATF had identified the importers of Austrian wine and narrowed its identification and testing activities to them, and, if so, when. This is a discrepancy which needs to be cleared up. BATF's responses to Congressman Horton's questions will be included in the record together with your responses to this letter.

Thank you for your anticipated cooperation. Please have your staff contact subcommittee counsel Stephen McSpadden if there are any questions. I do want to express my appreciation for BATF's carefully detailed responses in the attachment to your testimony.

Sincerely,

Doug Barnard, Jr.
Chairman

DB:srm:v

Enclosure

cc: Congressman Frank Horton, Room 2153 RHOB

OFFICE OF
THE DIRECTOR

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, D.C. 20226

July 11, 1986

REFER TO

RECEIVED
[illegible]
[illegible] AND
[illegible] AFFAIRS SUBCOMMITTEE

Honorable Doug Barnard, Jr.
Chairman
Subcommittee on Commerce, Consumer,
  and Monetary Affairs
Committee on Government Operations
House of Representatives
Washington, DC 20515

Dear Mr. Chairman:

As requested, enclosed are the answers to additional questions you had regarding my testimony on contaminated wines before the subcommittee on May 28, 1986.

Sincerely yours,

Deputy Director

A. Status report on recent identification and removal of DEG contaminated wines

1. Please provide a comprehensive list of contaminated wines identified since January 31, 1986, (the cut-off date in the GAO Report) to the present. Please list the wines by nationality and show as to each the DEG level and the approximate date of testing or DEG discovery.

RESPONSE: Following is a comprehensive list of contaminated wines, by nationality and approximate date of testing or DEG discovery, identified since January 31, 1986.

PRODUCT OF AUSTRIA

DESCRIPTION	DEG CONTENT	DATE OF TEST OR DISCOVERY
1976 Edelstaler Trockenbeerenauslese Bouvier u. Muskat-Ottonel white Grape Wine Imported By: Pieroth Wine Imports, Inc Franklin Park, Illinois Bottled and Shipped By: Ferdinand Pieroth, Burg Layen West Germany	.017 g/liter (17 ppm)	4/15/86
Ruster Red WPG Rust-Neusiedlersee Imported By: Dieter Steinmann Inc. Glendale, N.Y. Shipped By: All Austrian Wines & Spirits, Vienna	.004 g/liter (4 ppm)	4/15/86
Golden Castle 1983 Frauenkirchner Beerenauslese Burgenland - Rust-Neusiedlersee Imported By: Berani & Co. Cleveland, Ohio Shipped By: Gold-Kastell Weinkellereiges, Schermbeck	2.4 g/liter (2,400 ppm)	6/16/86

DESCRIPTION	DEG CONTENT	DATE OF TEST OR DISCOVERY
PRODUCT OF GERMANY		
1983 Gau-Kongerheimer Vogelsang White Eiswein Grape Rheinhessen, Rulander Qualitatswein met Pradikat Imported By: Pieroth Wine Imports Co. Franklin Park, Illinois Bottled By: Graflich Elzsche Wein - And Sektkellerei Burg Eltz GmbH AP #4 907 183 74 84	.040 g/liter (40 ppm)	4/15/86
1978 St. Martiner Schlos Ludwigshohe White Grape Wine Qualitatswein met Pradikat Beerenauslese Imported By: Pieroth Wine Imports, Inc. Franklin Park, Illinois Bottled and Shipped By: Ferdinand Pieroth, Burg Layen West Germany AP #5 907 183 99 79	.045 g/liter (45 ppm)	4/15/86
PRODUCT OF ITALY		
1983 Tenuta Di Pomino DOC White Wine Imported By: Paterno Imports LTD. Chicago, Illinois Bottled By: Marchesi De Frescobaldi	.011 g/liter (11 ppm)	4/15/86
1978 Barra Gattinara Imported By: Consolidated Distilled Products Inc. Chicago, Illinois Estate Bottled By: Guido Barra & Figlio	.003 g/liter (3 ppm)	4/15/86

PRODUCT OF ITALY

DESCRIPTION	DEG CONTENT	DATE OF TEST OR DISCOVERY
1983 Fattoria Paradiso Vigna dello Spungone Pagadebit White table wine of Bertinoro Imported By: Vinifera Imports LTD Wheaton, Illinois Estate Bottled By: Mario Perri	.030 g/liter (30 ppm)	4/15/86
1971 Kiola Barolo D.O.C. Imported By: Celarius, Inc. Los Angeles, CA. Bottled By: FDO S.p.A. - La Morra, Italy	.006 g/liter (6 ppm)	4/15/86
1983 Valenti Dolcetto d'alba DOC Imported By: Philip H. Thompson Los Angeles, CA. Bottled By: FDO S.p.A. - La Morra, Italy	.020 g/liter (20 ppm)	4/15/86
1984 Valenti Chardonnay Langhe, Piedmont Imported By: Celarius, Inc. Los Angeles, CA. Bottled By: FDO S.p.A.	.018 g/liter (18 ppm)	4/15/86
Bongiorno Lambrusco Italian Mellow Red Table Wine Imported By: Wine Merchants of Syracuse, Ltd. Liverpool, N.Y. Produced and Bottled By: Vinicola Correggese Correggio - Italy Code Number RI 813/RE	.002 g/liter (2 ppm)	5/23/86

2. At present, are there any wines being tested for DEG? If so, indicate the nationality of the wines and the number of samples or brands.

RESPONSE: BATF is continuing to test new shipments of Austrian wines for DEG on a routine basis. Samples of Austrian wines are analyzed by the BATF Lab before they are released to the importer by Customs. In addition, DEG testing has been made a permanent part of the screening process for all wines tested in our market sampling program.

BATF Labs currently have no backlog or inventory of wines in the process of DEG testing.

3. During your appearance you indicated that BATF is continuing to find Austrian wine on retailer shelves and that BATF had narrowed its spot checks to about 6,000 retailers. (p. 74 of unedited transcript.) We would like information on BATF's discovery on retailer shelves of (a) any Austrian wines which had not been tested at time of discovery (and of these, the number of wines found to be contaminated) and (b) wines (whether Austrian, German, or Italian) previously tested and determined to contain DEG, since January 31st to the present. For each of the above categories, indicate and list the number of brands and bottles/cases per each entity involved, the type of entity and general geographic location, the approximate date, and any actions taken to track down bottles/cases of the same brand elsewhere. Indicate how BATF narrowed to 6,000 the number of retailers carrying Austrian wine.

RESPONSE: My comments on this subject have been taken out of context. BATF has not "narrowed to 6,000 the number of retailers carrying Austrian wines." My testimony on this subject dealt with projections that as many as 6,000 retail dealers had been "spot-checked" for contaminated wines. The spot-checks included obtaining samples of suspect types of wines, general examination of stocks for contaminated wines, and follow-ups on complaints. In some instances groups of retailers in a specific market area were checked as part of one inspection assignment. BATF inspectors also checked for contaminated wines when conducting inspections at retail dealers for other reasons such as floor stock and special occupational tax inspections. More than 6,000 on-site checks were made at importers, wholesalers and retailers premises. Our statistics are based on inspection reports and other information submitted to BATF Headquarters from our regional/field offices.

Results of BATF spot-checks for DEG contaminated wines are summarized as follows:

BATF SPOT-CHECKS FOR DIETHYLENE GLYCOL CONTAMINATED WINES

KEY:

Type of entity:
W=Wholesaler/WLD
R=Retailer/RLD
C=Consumer

Geographic location:
NE=Northeast
MW=Midwest
SE=Southeast
SW=Southwest
W=West
PR=Puerto Rico

Origin of wine	Number of Bottles/Cases	Type of entity	Geographic location	Approximate Date	Results
Italian	12 bottles	1W	NE	10/1/85	*
*Samples selected for analysis					
Italian	2 bottles	2R	MW	12/4/85	*
*Consumer Complaint					
Italian	7 bottles	1W 7R	W	11/16/85	*
*Tested other brands. Contacted importers to remove product from market.					
German	3 bottles	1W	MW	3/24/86	*
*Samples submitted for analysis.					
Italian	24 cases	1W 1R	MW	5/2/86	*
*Product removed from market.					
German	25 bottles	3R	SW	8/3/85	*
*Samples submitted for analysis.					
Austrian	25 bottles	5W 1R	SW	8/17/85	*
*Samples submitted for analysis.					

Origin of wine	Number of Bottles/Cases	Type of entity	Geographic location	Approximate Date	Results
Austrian	1 bottle	C	MW	6/6/86	*
*Sample submitted for analysis. Product Recalled.					
Austrian	2 bottles	1W	NE	11/8/85	*
*Samples submitted for analysis.					
Italian	2 bottles	1W	NE	8/28/85	*
*Samples submitted for analysis.					
Austrian	1 case	1W	MW	8/24/85	*
*Samples submitted for analysis.					
German	103 cases 11 btls.	1W	MW	8/24/85	*
*Destruction of contaminated wines.					
German	174 cases 2 btls.	1W	MW	9/10/85	*
*174 cases recalled for return to Germany. 2 bottles obtained for testing.					
German	- 0 -	1W	W	7/26/85	*
*Contacted wholesaler to obtain samples for testing.					
Italian	2,064 cases 73 btls.	1W 8R	MW	1/25/86	*
*Wholesaler had 2,064 cases on hand for disposition. Six RLD's had 73 bottles of contaminated wine on hand.					
Italian	1,500 cases	1W	NE	4/1/86	*
*Wholesaler had 1500 case on hand for disposition.					
Italian	1 bottle	6R	NE	12/30/85	*
Italian	7 bottles	R	NE	1/25/86	*
*Samples submitted for analysis.					
Italian	- 0 -	10R	NE	1/3/86	*
*Recall follow-up.					

Origin of wine	Number of Bottles/Cases	Type of entity	Geographic location	Approximate Date	Results
Italian	23 bottles	10R	W	1/11/86	*
*Four RLD's had contaminated wine on hand.					
Italian	3,505 cases 44 btls.	1W 21R	NE	1/11/86	*
*Wholesaler had 3,500 cases on hand for disposition. Seven RLD's had 5 cases 44 bottles of contaminated wine on hand.					
Italian	274 bottles	123R	SE	1/11/86	*
*Twenty-six RLD's had 274 bottles of contaminated wine on hand.					
Italian	- 0 -	6R	NE	12/30/85	*
*Recall follow-up.					
Italian	6,254 cases 8 btls.	3W 40R	MW	1/4/86	*
*Wholesalers had 6,254 cases on hand for disposition. Three RLD's had 8 bottles of contaminated wine on hand.					
Italian	75 cases 452 btls.	1W 45R	W	12/30/85	*
*Distributor had 75 cases of contaminated wine on hand. Forty-four RLD's had 452 bottles of contaminated wine on hand.					
Italian	9,000 cases 111 btls.	1W 32R	MW	1/4/86	*
*Wholesaler had 9,000 cases on hand for disposition. Six RLD's had 111 bottles of contaminated wine on hand.					
Italian	- 0 -	22R	MW	1/24/86	*
*Recall follow-up.					
Italian	17,823 cases 25 btls.	3W 55R	MW	1/4/86	*
*Wholesalers had 17,823 cases on hand for disposition. Two RLD's had 25 bottles of contaminated wine on hand.					
Italian	9,001 cases	1W 7R	MW	1/11/86	*
*Wholesaler had 9,000 cases on hand for disposition. One RLD had 1 case of contaminated wine on hand.					

Origin of wine	Number of Bottles/Cases	Type of entity	Geographic location	Approximate Date	Results
Italian	2 bottles	14R	SE	1/4/86	*
*One RLD had contaminated wine on hand.					
Italian	3,000 cases	1W 29R	SE	1/4/86	*
*Wholesaler had 3,000 cases on hand for disposition. RLD's did not have contaminated wine on hand.					
Italian	- 0 -	6R	NE	1/4/86	*
*Recall follow-up.					
Italian	89 cases 18 btls.	2W	NE	1/8/86	*
*Product recalled.					
Italian	25 cases	1W	NE	1/8/86	*
*Product recalled.					
Italian	3 bottles	13R	SE	1/4/86	*
*One RLD had contaminated wine on hand.					
Italian	1 bottle	12R	SE	1/11/86	*
*One RLD had contaminated wine on hand.					
Italian	6,800 cases	1W 12R	SE	1/11/86	*
*Wholesaler had 6,800 cases on hand for disposition. RLD's did not have contaminated wine on hand.					
Italian	2 bottles	10R	SE	1/3/86	*
*One RLD had contaminated wine on hand.					
Italian	24 bottles	19R	SE	1/4/86	*
*Three RLD's had contaminated wine on hand.					
Italian	34 bottles	24R	SE	1/4/86	*
*Five RLD's had contaminated wine on hand.					
Italian	17 bottles	2W 18R	SE	1/4/86	*
*Wholesalers did not have any contaminated wine on hand. Five RLD's had contaminated wine on hand.					

Origin of wine	Number of Bottles/Cases	Type of entity	Geographic location	Approximate Date	Results
Italian	3 bottles	1W 17R	SE	1/11/86	*
*Wholesaler did not have any contaminated wine on hand. One RLD had contaminated wine on hand.					
Italian	64 bottles	35R	SE	1/11/86	*
*Nine RLD's had contaminated wine on hand.					
Italian	18 bottles	31R	SE	1/11/86	*
*Three RLD's had contaminated wine on hand.					
Italian	17 bottles	16R	SE	1/4/86	*
*Two RLD's had contaminated wine on hand.					
Italian	1,550 case 11 btls.	3W 30R	SE	1/4/86	*
*Wholesalers had approximately 1,550 cases on hand for disposition. Five RLD's had contaminated wine on hand.					
Italian	14 cases 44 btls.	36R	SE	1/4/86	*
*Six RLD's had contaminated wine on hand.					
Italian	21,000 cases	1W	SE	1/11/86	*
*Wholesaler had contaminated wine on hand for disposition.					
Italian	15 bottles	49R	SE	1/4/86	*
*Four RLD's had contaminated wine on hand.					
Italian	8 bottles	27R	SE	1/11/86	*
*Three RLD's had contaminated wine on hand.					
Italian	13 bottles	74R	SE	1/11/86	*
*Four RLD's had contaminated wine on hand.					
Italian	38 bottles	31R	SE	1/4/86	*
*Three RLD's had contaminated wine on hand.					

Origin of wine	Number of Bottles/Cases	Type of entity	Geographic location	Approximate Date	Results
Italian	7 bottles	32R	SE	1/4/86	*
*Four RLD's had contaminated wine on hand.					
Italian	2,008 cases 133 btls.	1W 14R	SE	1/11/86	*
*Wholesaler had 2000 cases on hand for disposition. Ten RLD's had 8 case and 133 bottles of contaminated wine on hand.					
Italian	37 bottles	23R	SE	2/8/86	*
*Four RLD's had contaminated wine on hand.					
Italian	- 0 -	30R	SE	2/8/86	*
*RLD's did not have contaminated wine on hand.					
Italian	1,616 cases 203 btls.	1W 75R	PR	1/11/86	*
*WLD destroyed 1530 cases under BATF supervision. Twenty-eight RLD's had 86 case and 203 bottles of contaminated wine on hand.					
Italian	- 0 -	4R	MW	1/11/86	*
*RLD's did not have contaminated wine on hand.					
Italian	90,000 cases 40 btls	1W 7R	MW	1/25/86	*
*WLD has 90,000 cases on hand for disposition. RLD's had 40 bottles of contaminated wine on hand.					
Italian	57,950 cases 1 btl.	8W 20R	NE	1/4/86	*
*WLD's had 57,950 cases on hand for disposition. One RLD had 1 bottle of contaminated wine on hand.					
Italian	4,689 cases 22 btls.	1W 10R	MW	1/18/86	*
*WLD had 4,689 case on hand for disposition. Four RLD's had 22 bottles of contaminated wine on hand.					
Italian	10,489 cases	1W 9R	SE	1/11/86	*
*WLD had 10,489 cases on hand for disposition. RLD's did not have contaminated wine on hand.					
Italian	6,500 cases	1W 10R	NE	1/6/86	*
*WLD had 6,500 cases on hand for disposition. RLD's did not have contaminated wines on hand.					

Origin of wine	Number of Bottles/Cases	Type of entity	Geographic location	Approximate Date	Results
Italian	19,000	2W	MW	1/3/86	*
*WLD's had contaminated wine on hand for disposition.					
Italian		6R	NW	1/18/86	*
*RLD's did not have contaminated wine on hand.					
Italian	4500 cases 45btls.	73R	SE	2/8/86	*
*WLD had removed 4500 cases from the retail market. Sixteen RLD's had 45 bottles of contaminated wine on hand.					
Italian	38 bottles	9R	MW	1/18/86	*
*Eight RLD's had contaminated wine on hand.					
Italian	13 bottles	9R	MW	1/4/86	*
*Four RLD's had contaminated wine on hand.					
Italian	14 bottles	14R	MW	1/4/86	*
*Three RLD's had contaminated wine on hand.					
Italian	- 0 -	14R	SE	12/14/85	*
*RLD's did not have contaminated wine on hand.					
Italian	- 0 -	5R	NW	1/18/86	*
*RLD's did not have contaminated wine on hand.					
Italian	9,500 cases	2W 18R	SE	1/18/86	*
*WLD's had 9,500 cases on hand for disposition. RLD's did not have contaminated wine on hand.					
Italian	12 bottles	30R	W	1/11/86	*
*Two RLD's had contaminated wine on hand.					
Italian	- 0 -	11R	MW	1/25/86	*
*RLD's did not have contaminated wine on hand.					

Origin of wine	Number of Bottles/Cases	Type of entity	Geographic location	Approximate Date	Results
Italian	74,099 cs 1,006 btls	3W 552R	W	1/8/86	*
*WLD's had 73,895 cases on hand for disposition. Ninety-seven RLD's had 204 cases and 1006 bottles of contaminated wine on hand.					
Austrian	6,000 bottles	1W	NE	9/24/85	*
*Product released to Importer and destroyed.					
Austrian	3 cases	1R	NE	10/16/86	*
*While conducting a Floor Stock Tax Inspection, contaminated wine was discovered at an RLD. Wholesaler was informed and arrangements were made to pick up the wine.					
Italian	15 bottles	5R	W	12/18/85	*
*While conducting a Floor Stock Tax Inspection, contaminated wine was found to be offered for sale. Importer was notified and arrangements made to pick up wine.					
Austrian	- 0 -	1W	W	1/18/86	*
*Inspection was conducted to determine if wholesaler had any 1978 Kirchberger Konigsbutt Eiswein Beerenauslese on hand.					
Austrian	1,400 cases	1W	W	12/9/85	*
*Supervised the destruction of contaminated wines.					

RESULTS OF BATF SPOT-CHECKS FOR DIETHYLENE GLYCOL CONTAMINATED WINES

Austrian wines which had not been tested at time of discovery (and of these, the number of wines found to be contaminated), since January 31, 1986:

Brand	No. of Bottles and/or Cases	Type of Entity	Geographic Location	Approximate Date	DEG Detected	Results
Edelstaler Trockenbeerenauslese	N/A	C	MW	2/12/86	17 ppm	*
Sandberger Backstube Beerenauslese	N/A	C	MW	2/12/86	- 0 -	*

*Product had been obtained from a consumer. No evidence that it was in the possession of the importer when the Product Alert was issued.

*Same as above.

RESULTS OF BATF SPOT-CHECKS FOR DIETHYLENE GLYCOL CONTAMINATED WINES

Austrian, German, or Italian wines previously tested and determined to contain DEG, since January 31, 1986, to the present:

Origin of Wine	Number of Bottles/Cases	Type of Entity	Geographic Location	Approximate Date	Results
Italian	2,064 cases 73 btls.	1W 8R	MW	1/25/86	*
*Wholesaler had 2,064 cases on hand for disposition. Six RLD's had 73 bottles of contaminated wine on hand.					
Italian	1 bottle	6R	NE	12/30/85	*
*One RLD had contaminated wine on hand.					
Italian	23 bottles	10R	W	1/11/86	*
*Four RLD's had contaminated wine on hand.					
Italian	3,505 cases 44 btls.	1W 21R	NE	1/11/86	*
*Wholesaler had 3,500 cases on hand for disposition. Seven RLD's had 5 cases 44 bottles of contaminated wine on hand.					

Origin of Wine	Number of Bottles/Cases	Type of Entity	Geographic Location	Approximate Date	Results
Italian	274 bottles	123R	SE	1/11/86	*
*Twenty-six RLD's had 274 bottles of contaminated wine on hand.					
Italian	6,254 cases 8 btls	3W 40R	MW	1/4/86	*
*Wholesalers had 6,254 cases on hand for disposition. Three RLD's had 8 bottles of contaminated wine on hand.					
Italian	75 cases 452 btls.	1W 45R	W	12/30/85	*
*Distributor had 75 cases of contaminated wine on hand. Forty-four RLD's had 452 bottles of contaminated wine on hand.					
Italian	9,000 cases 111 btls.	1W 32R	MW	1/4/86	*
*Wholesaler had 9,000 cases on hand for disposition. Six RLD's had 111 bottles of contaminated wine on hand.					
Italian	17,823 cases 25 btls.	3W 55R	MW	1/4/86	*
*Wholesalers had 17,823 cases on hand for disposition. Two RLD's had 25 bottles of contaminated wine on hand.					
Italian	9,001 cases	1W 7R	MW	1/11/86	*
*Wholesaler had 9,000 cases on hand for disposition. One RLD had 1 case of contaminated wine on hand.					
Italian	2 bottles	14R	SE	1/4/86	*
*One RLD had contaminated wine on hand.					
Italian	3,000 cases	1W 29R	SE	1/4/86	*
*Wholesaler had 3,000 cases on hand for disposition. RLD's did not have contaminated wine on hand.					
Italian	3 bottles	13R	SE	1/4/86	*
*One RLD had contaminated wine on hand.					
Italian	1 bottle	12R	SE	1/11/86	*
*One RLD had contaminated wine on hand.					
Italian	6,800 cases	1W 12R	SE	1/11/86	*
*Wholesaler had 6,800 cases on hand for disposition. RLD's did not have contaminated wine on hand.					

Origin of Wine	Number of Bottles/Cases	Type of Entity	Geographic Location	Approximate Date	Results
Italian	2 bottles	10R	SE	1/3/86	*
*One RLD had contaminated wine on hand.					
Italian	24 bottles	19R	SE	1/4/86	*
*Three RLD's had contaminated wine on hand.					
Italian	34 bottles	24P	SE	1/4/86	*
*Five RLD's had contaminated wine on hand.					
Italian	17 bottles	2W 18R	SE	1/4/86	*
*Wholesalers did not have any contaminated wine on hand. Five RLD's had contaminated wine on hand.					
Italian	3 bottles	1W 17R	SE	1/11/86	*
*Wholesaler did not have any contaminated wine on hand. One RLD had contaminated wine on hand.					
Italian	64 bottles	35R	SE	1/11/86	*
*Nine RLD's had contaminated wine on hand.					
Italian	18 bottles	31R	SE	1/11/86	*
*Three RLD's had contaminated wine on hand.					
Italian	17 bottles	16R	SE	1/4/86	*
*Two RLD's had contaminated wine on hand.					
Italian	1,550 case 11 btls.	3W 30R	SE	1/4/86	*
*Wholesalers had approximately 1,550 cases on hand for disposition. Five RLD's had contaminated wine on hand.					
Italian	14 cases 44 btls.	36R	SE	1/4/86	*
*Six RLD's had contaminated wine on hand.					
Italian	15 bottles	49R	SE	1/4/86	*
*Four RLD's had contaminated wine on hand.					
Italian	8 bottles	27R	SE	1/11/86	*
*Three RLD's had contaminated wine on hand.					

Origin of Wine	Number of Bottles/Cases	Type of Entity	Geographic Location	Approximate Date	Results
Italian	13 bottles	74R	SE	1/11/86	*
*Four RLD's had contaminated wine on hand.					
Italian	38 bottles	31R	SE	1/4/86	*
*Three RLD's had contaminated wine on hand.					
Italian	7 bottles	32R	SE	1/4/86	*
*Four RLD's had contaminated wine on hand.					
Italian	2,008 cases 133 btls.	1W 14R	SE	1/11/86	*
*Wholesaler had 2000 cases on hand for disposition. Ten RLD's had 8 case and 133 bottles of contaminated wine on hand.					
Italian	37 bottles	23R	SE	2/8/86	*
*Four RLD's had contaminated wine on hand.					
Italian	1,616 cases 203 btls.	1W 75R	PR	1/11/86	*
*WLD destroyed 1530 cases under BATF supervision. Twenty-eight RLD's had 86 case and 203 bottles of contaminated wine on hand.					
Italian	90,000 cases 40 btls	1W 7R	MW	1/25/86	*
*WLD has 90,000 cases on hand for disposition. RLD's had 40 bottles of contaminated wine on hand.					
Italian	57,950 cases 1 btl.	8W 20R	NE	1/4/86	*
*WLD's had 57,950 cases on hand for disposition. One RLD had 1 bottle of contaminated wine on hand.					
Italian	4,689 cases 22 btls	1W 10R	MW	1/18/86	*
*WLD had 4,689 case on hand for disposition. Four RLD's had 22 bottles of contaminated wine on hand.					
Italian	4500 cases 45btls.	73R	SE	2/8/86	*
*WLD had removed 4500 cases from the retail market. Sixteen RLD's had 45 bottles of contaminated wine on hand.					
Italian	38 bottles	9R	MW	1/18/86	*
*Eight RLD's had contaminated wine on hand.					

<table>
<tr><th>Origin of Wine</th><th>Number of Bottles/Cases</th><th>Type of Entity</th><th>Geographic Location</th><th>Approximate Date</th><th>Results</th></tr>
<tr><td>Italian</td><td>9,500 cases</td><td>2W 18R</td><td>SE</td><td>1/18/86</td><td>*</td></tr>
<tr><td colspan="6">*WLD's had 9,500 cases on hand for disposition. RLD's did not have contaminated wine on hand.</td></tr>
<tr><td>Italian</td><td>12 bottles</td><td>30R</td><td>W</td><td>1/11/86</td><td>*</td></tr>
<tr><td colspan="6">*Two RLD's had contaminated wine on hand.</td></tr>
<tr><td>Italian</td><td>13 bottles</td><td>9R</td><td>MW</td><td>1/4/86</td><td>*</td></tr>
<tr><td colspan="6">*Four RLD's had contaminated wine on hand.</td></tr>
<tr><td>Italian</td><td>14 bottles</td><td>14R</td><td>MW</td><td>1/4/86</td><td>*</td></tr>
<tr><td colspan="6">*Three RLD's had contaminated wine on hand.</td></tr>
<tr><td>Italian</td><td>74,099 cs 1,006 btl</td><td>3W 552R</td><td>W</td><td>1/8/86</td><td>*</td></tr>
<tr><td colspan="6">*WLD's had 73,895 cases on hand for disposition. Ninety-seven RLD's had 204 cases and 1006 bottles of contaminated wine on hand.</td></tr>
<tr><td>Austrian</td><td>3 cases</td><td>1R</td><td>NE</td><td>10/16/86</td><td>*</td></tr>
<tr><td colspan="6">*While conducting a Floor Stock Tax Inspection, contaminated wine was discovered at an RLD. Wholesaler was informed and arrangements were made to pick up the wine.</td></tr>
<tr><td>Italian</td><td>15 bottles</td><td>5R</td><td>W</td><td>12/18/85</td><td>*</td></tr>
<tr><td colspan="6">*While conducting a Floor Stock Tax Inspection, contaminated wine was found to be offered for sale. Importer was notified and arrangements made to pick up wine.</td></tr>
</table>

When our inspections disclosed contaminated wines at wholesaler or retailer premises, BATF inspectors advised industry members to remove the wines from sale and contact their supplier for disposition instructions. In some instances BATF inspectors also contacted suppliers to ensure that contaminated wines were removed from sale.

4. What actions are wholesalers and importers of wines found to be contaminated expected to take to re-export or destroy these wines? Is there any BATF monitoring of such actions? (If so, please describe it.)

RESPONSE: We have consistently instructed wholesalers of contaminated wines to contact their supplier (importer) and importers of contaminated wine to either destroy said wine or ship it back to the producer and/or shipper. Importers have also been instructed to contact the U. S. Customs Service for instructions concerning disposition of such wines. Customs must be contacted to file necessary claims for refund or credit of taxes and duty on the products. Contaminated wines have been re-exported, destroyed or held pending instructions from the foreign supplier. BATF has been notified by some importers and monitored disposition actions on a spot check basis.

B. Alleged violations and BATF compliance and enforcement activity

1. (a) Please furnish information on possible or alleged violations of law and on BATF compliance/enforcement activity, arising out of the DEG contamination of imported wines, including for each category of alleged violations (such as failure to submit test reports or samples, etc.) the numbers and types of both investigations and enforcement actions/orders (including suspension and revocation). (b) Please furnish similar information on compliance activity arising out of the recent methanol contamination.

RESPONSE: (a) In the written testimony presented to the Subcommittee on May 28, 1986, I discussed BATF's regulatory authority with respect to imported contaminated wines. Specifically, in response to questions 1a and 1b posed by the Subcommittee, I described in detail the nature and scope of BATF's authority under the Federal Alcohol Administration Act (FAA Act), to impose various requirements upon importers and wholesalers. I also discussed the nature of the violations that might arise as well as the sanctions that may be imposed upon importers and wholesalers who fail to comply with the requirements imposed by law.

BATF is currently conducting several investigations in connection with this matter. Any release of information at this time concerning the nature of these investigations would be premature and could jeopardize the outcome. Furthermore, as of this time BATF has not taken any permit actions (either suspension or revocation) against any importer or wholesaler arising out of the importation and/or sale of wines contaminated with DEG.

BATF's current procedure for follow up on contaminated products entails contact with the importers who were identified as holding Certificates of Label Approval for these products to determine whether they received BATF's Product Alerts; what action they took upon receipt of the alerts, if any; whether they tested any wines and the results of those tests; and whether they contacted their distributors and/or conducted any product recalls.

In addition, BATF has also been following up with the wholesalers identified by importers to determine whether they received any of the brands of imported wines found by BATF to have been contaminated with DEG, and if they had contaminated brands in their inventory, when they received the wines (i. e., before or after the issuance of the Product Alert); whether they received any information or notification from importers; whether they tested wines in their inventory and the results of those tests; and whether they contacted any retailers and/or conducted any product recalls.

RESPONSE: (b) BATF has not engaged in similar compliance activity in this area since all of its tests to date, as well as tests conducted by commercial laboratories on behalf of the industry, have disclosed no problem with the methanol levels in Italian wines.

2. The Michigan importer of the wine with the highest DEG contamination, a 1982 Austrian wine (#50 on BATF's list), told GAO staff that it never carried that wine or 3 of 4 Austrian wines shown to be contaminated, although this importer was listed as the original importer for these wines in BATF records and its name was found on the label of the sampled wine containing the highest level of DEG. This raises serious questions, such as, where are bottles of this wine located, which importer carries this wine (and why does the importer whose name is on the label deny carrying it), and are there cases of this (and the 3 other wines) still in warehouses or on retailers shelves? Please respond to the above questions and indicate BATF's efforts to track these wines.

RESPONSE: We have determined that the high DEG-content Austrian wine in question, a 1981 Bouvier Trockenbeerenauslese from the Rust-Neusiedlersee Region, with a DEG content of 19.66 grams per liter (19,660 ppm) was imported by Victor Viviano, Alameda, California rather than Viviano Wine Importers, Inc., Detroit, Michigan. Two additional Austrian wines, a 1982 Muskat Ottonel Auslese from the Rust-Neusiedlersee Region, with a DEG content of 0.37 grams per liter (370 ppm) and a 1982 Gruner Veltliner Spatlese from the Klosterneuberg Region, with a DEG content of 1.82 grams per liter (1,820 ppm) originally shown as being imported by Viviano Wine Importers, Inc., Detroit, Michigan were also imported by Victor Viviano, Alameda, California. Our master lists have been updated to show the correct importer information for these wines.

Our Western Region field inspectors have conducted an in-depth investigation of this contaminated wine. Viviano's records show that he received and sold a total of 35 cases of the 1981 Bouvier Trockenbeerenauslese. The wines were sold directly to consumers. Our inspectors have verified Viviano's recall requests. To date, 32 cases of the contaminated wine were returned to Viviano for disposition.

In addition, Viviano's records indicated that 30 customers purchased Austrian wine. Viviano notified these customers, via telephone and mail, of the DEG problem with Austrian wine on August 1, 1985, after receiving our Product Alert. Viviano subsequently submitted all his Austrian wines to an independent laboratory for testing. Upon learning that some of his wines contained DEG he notified these customers, via telephone and mail, of the DEG problem with the specific Austrian wines.

The circumstances in this case emphasize the importance of our Product Alert. In the Alert we informed industry members of the potential health risk associated with consuming DEG contaminated wines and informed industry of the embargo and testing procedures implemented for DEG prior to entry into the U.S. In addition, we requested industry members to test and withhold all Austrian wines from sale pending verification that such wines do not contain DEG. Viviano's compliance with the Product Alert ensured prompt notification of consumers and recall of the contaminated product.

3. GAO developed information that BATF regional/field staff had serious problems with an Illinois importer of 17 of the 54 contaminated Austrian wines (including 2 of the most 5 most (Sic) contaminated wines), and several German wines, because they allegedly failed to remove contaminated wines or were otherwise uncooperative. (A knowledgable third party contacted the subcommittee and generally confirmed compliance problems with this importer.) Please indicate (a) the potential violations which BATF has found involving this importer (and the numbers and amounts of wines involved) and (b) the present status of any compliance activity.

RESPONSE: As indicated in our response to question 1(a) above, BATF is currently conducting several investigations. However, as of this time, BATF has not recommended nor taken any type of action against an importer or wholesaler arising out of the importation or sale of wines contaminated with DEG.

4. How many importer and wholesaler licenses has BATF (a) suspended or (b) revoked in each of the last ten years, prior to 1985 (the DEG situation), and for what reasons.

RESPONSE: During the last ten years BATF has neither suspended nor revoked importer or wholesaler permits for contaminated product problems.

C. Information on illnesses and deaths

You testified that "there has not been one confirmed report of any death or illness in the United States resulting from DEG-contaminated wines." Respond to the following questions arising from this assertion:

1. a. Have there been any unconfirmed reports of death or illness in the United States?

RESPONSE: BATF received several inquiries from consumers complaining about various physical effects after drinking specific brands of wine with DEG. Some of these complaints were referred to BATF by FDA. Most of the inquiries were about Italian wines. Complaints about other wines involved brands which had been previously tested by BATF. None of the reports linked DEG-contaminated wines to death.

b. Have there been any reports (confirmed or not) of deaths or illness in Europe?

RESPONSE: We have received no reports of death or illness in Europe.

2. Did BATF or FDA actively solicit illness or death reports from the public after describing possible symptoms? If so, please furnish relevant BATF statements/material.

RESPONSE: BATF did not actively solicit illness or death reports from the public after describing possible symptoms.

3. Does BATF possess any documentation (irrespective of source, including FDA) showing that no illness or injuries resulted (as opposed to the absence of any such information)? If so, please provide it.

RESPONSE: BATF has no documentation showing the lack of illness or injuries due to DEG contamination.

D. Discrepancies concerning (1) the number of on-site BATF field inspections and (2) the existence of a master list of contaminated wines

1. You testified before the subcommittee (p. 6 of statement) that BATF did "hundreds of on-site inspections." Yet, page 12 of the attachment to your testimony states: "...our inspectors have visited thousands of retail establishments nationwide to determine if contaminated wines were being sold." Please resolve this discrepancy, and furnish to the subcommittee a precise number of on-site inspections of retailers, wholesalers, and importers, a separate figure for each category, if one is available. (If precise information cannot be given, indicate how the final estimate was arrived at.)

RESPONSE: The information I presented at the hearing concerning "hundreds of on-site inspections" was based on estimates for inspections to follow up on early problems with DEG and to obtain samples of wine for testing. BATF inspectors visited approximately 62 wholesalers and importers and 1,874 retailers for such purposes. In some instances groups of wholesalers, importers and retailers in a market area were checked as part of one inspection assignment to follow up on specific problems.

My statement that "...our inspectors have visited thousands of retail establishments nationwide to determine if contaminated wines were being sold" is derived from the fact that BATF inspectors checked for contaminated wines while conducting inspections at retail premises for other reasons such as floor stock and special occupational tax inspections. More than 6,000 such on-site checks were made at importers, wholesalers and retailers premises. Our statistics are based on inspection reports and other information submitted to BATF Headquarters from our regional/field offices.

2. Page 10 of BATF's testimony asserts that GAO's findings on the lack within BATF of a master list of contaminated wines (prior to GAO's request for one) was "erroneous." In view of GAO's repeated assertions at the hearing that BATF was unable to provide such a list until December 1985, please furnish to the subcommittee a copy of the list that pre-existed GAO's request and indicate, if known, the person/offices (including BATF regional or field staff)/entities receiving that list. If such a list did exist, then why did BATF not furnish it to GAO when they first requested it?

RESPONSE: BATF compiled numerous "master lists" of contaminated wines found in the United States. These lists were updated and provided to BATF Regional Directors on 8/7/85, 8/29/85, 9/5/85, 9/20/85, 10/4/85, 2/21/86 and 7/1/86. Exhibit "1" provides these lists. Press releases were provided to all Regional Directors to ensure that the master lists were up-to-date. BATF regional offices provided the lists to field inspectors.

Peg Reese of GAO initially contacted BATF (John Balakos, Chief, Internal Audit Division, BATF Office of Internal Affairs) by telephone on November 12, 1986, concerning BATF's involvement in the diethylene glycol problem. In addition, a meeting between GAO and BATF representatives was held on December 6, 1985. As a result of these contacts, BATF provided GAO substantial information on the contaminated wine problem including a copy of the August 7, 1985, master list and an up-to-date master list of contaminated wines on December 11, 1985.

We have no idea why GAO reported that there was no master list of contaminated wines prior to their request for one.

E. Adequacy of BATF's testing and laboratory resources and testing protocols

Information developed at the hearing indicates that BATF needs additional laboratory resources for testing wines and better testing protocols. Please specify (i) the additional testing equipment and the types and numbers of laboratory personnel needed, estimating the annual costs of such, and (ii) the improved testing protocols being considered for random testing.

RESPONSE: With additional personnel and equipment, BATF laboratories could conduct the following types of research projects:

- develop analytical methods for identifying more ingredients in beverage alcohol products. Currently less than 5% of the compounds indigenous to beverage alcohol products can be identified.

- develop automated, rapid procedures for characterizing and chemically fingerprinting all commercial beverage alcohol products. Pattern deviations would become more apparent and could be investigated as to the cause of deviation. Greater use of computer analysis of lab data would be a valuable asset.

- devote more time keeping abreast of the latest developments in the processing technologies of regulated industries and other related fields.

- improve sensitivity of detection, reliability of data, and productivity.

- develop a comprehensive sampling program based on the latest scientific information and techniques of analyses.

- develop a closer working relationship with our counterparts in other countries. This would help to promote a free exchange of scientific information and enable us to learn about problems quicker.

Specific examples of equipment needed, at this time, to determine whether unauthorized ingredients are in alcohol beverage products as well as the number of personnel authorized to operate the equipment listed below.

Equipment Needed For Examining Alcohol Beverages For Contaminants

Quantity	Instrument	Cost	Personnel (FTE)
1	Gas-Chromatograph/Fourier Transform Infrared Spectrophotometer (GC/FTIR)	$125K	1

This instrument is used for rapid screening of alcohol beverage products for a variety of contaminants. It is needed to "profile" products to accumulate the data-base that will allow the laboratory to observe changes in products (i.e. to spot potential problems signaled by a change in character)

1	Mass Spectrometer	$285K	1

This instrument is more sensitive and specific than the CG/FTIR which is used as a screening instrument. The Mass Spectrometer provides the definitive identification upon which regulatory or legal action be taken against a product.

4	Gas-Chromatographs	$100K (total)	2

These GCs are replacement units for the HQ and San Francisco lab's aging equipment. Gas-Chromatographs are the work-horses of any modern laboratory since they can do such a wide variety of analytical jobs. These instruments, which are in constant use, are in need of replacement.

With additional resources there is potential for improved research and protocols in the alcohol beverage area. Listed below are a few examples:

- agricultural chemicals for promoting growth and as pesticides.
- development of new enzymes and yeasts by genetic engineering.
- changes in water supplies and water treatment.
- new sanitizing agents, anti-microbials, preservatives, filtration agents, sweeteners, foam stabilizers, flavors, and colors.
- potential use of antibiotics in the fermentation process.
- greater problems with micro-organism spoilage in reduced alcohol products.
- radioactive fallout contamination of agricultural products and water supplies.

- lack of toxicological data for new substances in combination with alcoholic beverages.
- unique radiolytic reaction compounds caused from increasing use of irradiation as a sterilizer.
- development of new sweeteners.
- the lack of batch identifiers continues to handicap an effective lab testing program.

F. Ambiguity as to how BATF handled the identification of methanol contaminated wines differently than that for the DEG contaminated wines

Page 15 of BATF's testimony states that the only difference in the procedures and policies in these two contamination situations is the "paper trail" which BATF apparently maintained for the methanol contamination. Yet, on page 97 of the unedited hearing transcript (and also elsewhere), you testified that BATF "operated even more effectively because we learned from the first time out..." Please specify exactly what BATF did differently in response to the methanol situation, even if these differences were limited to the maintenance of additional documentation. (In that case, what additional documentation did BATF keep, and what does it show?)

RESPONSE: First, it is necessary to examine my comment in the proper context. Rep. Barnard inquired about overlapping BATF and FDA responsibilities and what could be done in the law to clear up any inconsistencies. I responded that we (in generic terms of BATF and FDA) learned a lot from the first time out. DEG was the first instance which required extensive coordination on contaminated products between the two agencies. This experience permitted both BATF and FDA to expedite handling of the potential methanol problem.

Critical procedures followed during the DEG problem were also followed during the methanol problem. We conducted spot-check laboratory testing of suspect Italian wines for methanol, just as we had done with Austrian, German, Italian and other wines for DEG testing. No Italian wines have been removed by BATF from the marketplace. All commercial laboratory reports submitted to BATF from Industry to date have disclosed safe levels of methanol, i.e. less than 0.1 percent by volume. All market samples of Italian wines tested by BATF's laboratories in San Francisco and Rockville also show safe levels of methanol.

We ensured maximum notification to wholesalers and importers about both the DEG and methanol problems by issuing Product Alerts which outlined the respective problems and procedures to be followed. After receiving documentary assurances from the Italian government that all Italian wines bottled or shipped prior to December 12, 1985 were free of methanol contamination, BATF issued Industry Circular #86-10 dated 4-21-86.

This circular advised Industry of the procedures to follow for the testing and documentation of methanol in Italian wines bottled or shipped on or after December 12, 1985 which were currently in their inventories and those of their retail customers, in customs bonded warehouses awaiting release, or in transit from Italy. In essence this circular requires the testing of all Italians which are not covered by a "Certificate of Analysis" issued by an Italian testing laboratory approved by the Italian Ministry of Agriculture.

All testing of Italian wines performed by commercial laboratories or Italian approved testing facilities are documented by way of laboratory reports which shows the percent of methanol content by each brand and type of wine tested. These laboratory analyses are being maintained by the individual industry members and BATF's Alcohol Import-Export Branch.

The DEG Product Alerts were mailed from the BATF Regional offices, while the methanol Product Alerts were mailed from the BATF Distribution Center, using mailing lists supplied by BATF Regional Offices. This difference was due to administrative reasons and not due to any change affected by the nature of the differences between the DEG and methanol problems.

There were certain differences between the DEG problem and the recent methanol problem that permitted us to operate more effectively. For example, the cooperation of the Italian Government permitted us to quickly identify potential problem wines. This contrasts with the difficulty we experienced in obtaining initial product information from the Austrian Government concerning the DEG problem . In addition, we obtained extensive intelligence data from both foreign and domestic sources on the methanol problem. This permitted us to more effectively monitor and analyze the potential methanol problem.

Additional documentation was primarily a detailed chronology of contacts with other Federal agencies, foreign governments and organizations.

Our primary concern continues to be the identification and removal of contaminated wines from the market as quickly as possible.

G. Information about foreign government standards for wine and their policies and procedures for testing for contaminants, and international wine organizations

1. There were several inquiries during the hearing about the standards foreign wines imported into the United States are subjected to by home country governments. Would you please (a) summarize those standards and also (b) describe the procedures for testing for contaminants, followed by the governments of the 10 countries exporting the most wine to the United States, to the extent that this information is readily available? And, in the case of West Germany (FDR), Austria, and Italy, indicate the actions each government took to remove wines contaminated with DEG or methanol.

RESPONSE: (a) Japan and the EEC countries of Italy, France, West Germany, Spain, Portugal, Greece, United Kingdom account for 8 of the 10 countries exporting the most wine to the United States. Exhibits "2" and "3" summarize basic wine production standards for Japan and the EEC.

(b) German Federal and State Governments tested thousands of Austrian and German wines for DEG. The West German Government considered wines with DEG to be adulterated since EEC regulations do not permit the use of DEG in wine production.

According to Austrian authorities 70 people were arrested in connection with the DEG problem. In addition, 25,000 laboratory analyses were conducted and over 6.8 million gallons of wine seized. In response to the DEG problem, the Austrian Government instituted a new wine law which provides for the preparation of export certificates by Government laboratories certifying to the absence of DEG.

The German Government also conducted extensive testing of Italian wines for methanol. Italian wines with high levels of methanol were found in Baden-Wuerttenburg and Hessen. The German and French Governments checked all Italian wines entering that country for methanol before release from Customs. We also received information that the Governments of the United Kingdom, Denmark and Brazil closely monitored the Italian methanol problem and conducted laboratory testing of Italian wines.

We have no information on actions taken by other countries.

2. a. Please describe the activities of the OIV (apparently the international organization of government bodies regulating wine), as they relate to identifying and removing contaminated wines.

RESPONSE: The International Office of Vine and Wine (OIV) was established in 1924 pursuant to an intergovernmental agreement.

In its more than 60 years, the membership of the OIV has grown from eight to 33 countries representing 94 percent of worldwide wine production. Its members are as follows:

Algeria
Argentina
Australia
Austria
Belgium
Bulgaria
Chile
Cyprus
Czechoslovakia
Denmark
France
Federal Republic of Germany
Greece
Hungary
Israel
Italy
Luxembourg
Mexico
Morocco
Netherlands
Portugal
Romania
South Africa
Spain
Switzerland
Syria
Tunisia
Turkey
U.S.S.R.
United Kingdom
United States
Uruguay
Yugoslavia

The OIV has gained recognition as a highly influential organization whose policies on economic, technical and scientific issues, although non-binding, are frequently reflected in the national legislation and market initiatives of its member countries.

The undertakings of the OIV encompass all issues of general viticultural concern; however, its primary purpose is to study wine - its production methods, packaging and labeling standards and associated marketing practices - with the object of insuring product integrity and harmonizing regulatory requirements in international wine trade.

As to its role relative to product integrity, one of the fundamental elements of the international agreement establishing the OIV charges the organization with submitting to its member governments any proposals: to insure, in the interest of both the consumer and the producer, the repression of fraud and unfair competition by seizing products appearing on the market in violation of the law; and, through civil and criminal suits, to prohibit unlawful practices, compensate the injured parties, and punish the perpetrators.

In this connection, at the September 1985, General Assembly of the OIV, the organization passed the following resolution in response to the diethylene glycol contamination incidents:

> "A recent instance of wine fraud has been widely recognized by the public worldwide. The fight against fraud is one of the fundamental missions of the International Office of Vine and Wine.
>
> Owing to this fact, the General Assembly:
>
> - draws attention to the fact that it has always condemned and fervently continues to condemn all fraudulent practices. It looks with satisfaction on measures taken by the States to pursue the perpetrators of fraud and to destroy their adulterated products;
>
> - requests that the Convention Sub-Commission on Methods of Analysis and Evaluation of Wines intensify its work on matters of analysis with the object of detecting and preventing fraud;
>
> - recommends to the States the enlargement or establishment of direct relations among their regulatory agencies in liaison with the OIV and charges the Group of Experts, "Wine Regulation and Quality Control", with studying this question."

Regarding the activities of the OIV as they relate to identifying and removing contaminated wines, as the above background information indicates, the organization does not have the authority to take direct action to remove contaminated wines from the market; however, the organization does work to encourage the efforts of its members in this connection.

One of the areas in which the OIV provides support in this area is through its policy of informing its member countries of any information available to it concerning wine fraud, whether it be contamination, mislabeling or otherwise.

Thus, it was through the OIV that BATF first learned of the methanol contamination of Italian wines.

Another way in which the OIV provides support is through its scientific program to establish methods of analysis for the precise and accurate quantitative determination of the chemical components of wine.

As the second sub-paragraph of the above quoted resolution indicates, because of the detection in certain wines of diethylene glycol, a potentially toxic adulterant, the OIV has undertaken an intensified scientific study of the overall subject of wine contaminants with the object of adopting the chemical method or methods which offer the most accurate and precise means for their quantitative detection.

The chemical methods of analysis adopted by the OIV in this regard will be made available to the public.

In summary, although the OIV does not operate by direct intervention, the activities of this organization in the area of product integrity have served in the past, and will continue to serve to a greater extent in the future, to assist those whose responsibility it is to identify and remove contaminated wine from the market.

b. Would that organization be useful in developing an improved intelligence gathering system, as you suggested during your testimony, and, if so, how? If not, what system could be used by BATF?

RESPONSE: We believe the OIV could be useful in developing an improved intelligence gathering system by encouraging its member governments to work more closely among themselves and by acting as a central point for disseminating the information gathered by individual members.

In this connection, we refer to the third sub-paragraph of the resolution quoted in our response to Question G(2)(a).

In this sub-paragraph, the OIV, "recommends to the States the enlargement or establishment of direct relations among their regulatory agencies in liaison with the OIV and charges the Group of Experts, "Wine Regulation and Quality Control", with studying this question."

This recommendation is presently being studied, and BATF is giving its strong support to the establishment of collaborative investigative procedures which would enable regulatory agencies to gain immediate access to the specific information needed to act against wines which were deliberately or accidentally contaminated or which are otherwise being marketed in a fraudulent manner.

It is hoped that the study will lead the OIV to recommend such procedures and thus encourage the efforts of those of its member governments seeking better coordination and more direct lines of communication among their respective regulatory agencies.

In addition to its initiatives within the OIV, BATF is also continuing to pursue, within the framework of the U.S. - EEC technical consultations on wine, the establishment of a mutually acceptable system of collaboration to facilitate the investigation of international wine fraud between the U.S. and the Member States of the Community.

The EEC has informed BATF that, before such a system could be formalized, Community regulations must be enacted to set the legal groundwork to permit EEC Member States to collaborate with third countries in this regard. We have been advised that these regulations are expected to be enacted late this year.

H. Information requested by Congressman Frank Horton

1. On p. 88 of the unedited transcript of the hearings, Congressman Horton asked for BATF's analysis of the existing legal authorities and the possible need for additional authorities including additional legislation. In your analysis, please indicate whether BATF intends to implement the two missing regulations referenced on pages 68 and 73 of the hearing transcript.

RESPONSE: In the written testimony presented to the Subcommittee on May 28, 1986, I discussed BATF's existing legal authority with respect to imported contaminated wines (see pages 1 through 5 of the prior testimony).

With respect to the possible need for additional authority in this area, I have advised Congressman Horton that BATF is currently analyzing this question. Included in BATF's analysis will be an evaluation of the need for regulations to implement Section 2(d) of the Federal Alcohol Administration Act, which provision is the one referred to on pages 68 and 73 of the hearing transcript.

I further advised Congressman Horton that BATF expects to conclude its analysis by the end of the year and will be glad to provide the Subcommittee with its recommendations.

2. At the end of the hearing, Congressman Horton asked for BATF's responses to additional questions. (For your convenience, an additional copy is attached.) The first question deals with the discrepancy between your testimony and GAO's findings as to whether BATF had identified the importers of Austrian wine and narrowed its identification and testing activities to them, and, if so, when. This is a discrepancy which needs to be cleared up. BATF's responses to Congressman Horton's questions will be included in the record together with your responses to this letter.

RESPONSE: As indicated in our testimony, we identified 1,800 labels approved for white, red, and rose Austrian wines through our computerized index of Certificates of Label Approval. This list was compiled, sometime during the week of July 15 - 19, 1985, after learning of the possible contamination of Austrian wines with DEG. The list contained information concerning labels approved for Austrian wines, including vendor codes and basic permit numbers of importers. Our Regional Directors were instructed to contact the identified importers of the DEG problem.

GAO was provided an identical list to the one mentioned above in December 1985. In addition, we explained to GAO on several occasions that the actual names of importers were not shown on the list, but vendor code and basic permit number identification made it possible for BATF to specifically identify importers by name.

We have no idea why GAO reported that such a list was not made.

Exhibit "4" is a current computerized index of Certificates of Label Approvals for Austrian wines, including vendor codes and basic permit numbers of importers.

[Subcommittee Note: See Appendix 7 for additional information supplementing BATF's July 11, 1986, response.]

EXHIBITS

RESPONSE TO
HONORABLE DOUG BARNARD, JR.

ADDITIONAL ISSUES - DIETHYLENE GLYCOL

EXHIBIT "1"

BATF MASTER LISTS OF DEG CONTAMINATED WINES

8/7/85 LIST

PANAFAX COVER SHEET

TO: -All Regional DIRECTORS (COMPLIANCE)
-Chiefs, Field OPERATIONS Philadelphia AND CINCINNAT
-LAW ENFORCEMENT DISTRICT OFFICES

FM: Chief, Product Compliance

SUBJECT: CONTAMINATED AUSTRIAN Wines

PANAFAX #: 7754

NUMBER OF PAGES: 7

REMARKS: Law enforcement offices Please provide copies of attached to compliance operations Area Supervisors at your location.

Mavis Oxford
Chief CIP

1 of 7

(page 1) (Updated as of 08/07/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

1.
1982 St. Margarethener Auslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

2.
1981 Gumpoldskirchner Doktor Spatlese
Imported by:
Chateau and Estate Wines Comp.
New York, New York
Produced by:
Dr. Ernst Weigl
Gumpoldskirchen, Austria

3.
1982 Weissburgunder
Pinot Blanc Dry Cabinet
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut Sepp Hold,
St. Georgen, Austria

4.
1983 Ruster Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei [illegible]
Burg Layen, West Germany

5.
1981 St. Margarethener Beerenauslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

(page 2) (Updated as of 08/07/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

6.
1981 Rust Neusiedlersee Trockenbeerenauslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

7.
1983 Ruster Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

8.
1980 St. Margarethener Trockenbeerenauslese
Imported by:
Niederthaler Hof Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Niederthaler Hof
Schlossbockelheim, West Germany

9.
1979 Breitenbrunner Welschriesling Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

10.
1983 Illmitzer Felsonecker Beerenauslese - Rose'
(Rose' Wine)
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau GMBH
Burg Layen, West Germany

(page 3) **(Updated as of 08/07/85)**

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

11.
1983 Illmitzer Kaisergarten Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

12.
1983 Felser Schillingsberg Eiswein
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

13.
1980 Rust-Neusiedlersee Eiswein Beerenauslese - Rulander
Especially selected for Kane Beverage Mart
Imported by:
Wein-Bauer,
River Grove, Illinois
Shipped by:
Wein-Bauer
Stockerau, Austria

14.
1983 Podersdorfer Kaisergarten Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

15.
1979 Pamhagener
(Rose' Wine)
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

16.
1981 Edelstaler Kaisergarten Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth - Weinkellerei GMBH
Burg Layen, West Germany

17.
1981 Weidener Kaisergarten Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

18.
1980 Edelstaler Kupferhohe Eiswein
(Gewurztraminer)
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany
Bottled by:
Weingut Haller, Monchhof, Austria

19.
1980 Monchhofer Steingang Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Bottled by:
Weingut Haller
Monchhof, Austria

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

20.
1984 Osterreich Neusiedler See Spatlese
(Karl Walden Selection)
Imported by:
American B. D. Co.
Hawthorne, New Jersey
Bottled by:
Richard Trimborn
Bad Kreuznach, Germany

21.
1982 Gruner Veltliner Kabinett
(Pustaqueen)
Imported by:
Schlossadler
Garden Grove, California
Bottled and shipped by:
J. Hafner
Monchhof, Austria

22.
1982 Rust Neusiedlersee Spatlese
Imported by:
Schumacher and Sons Distr. Inc.
Chicago, Illinois
Shipped by:
Weinkellerei St. Kunibert GmbH,
Leiwen/Germany

23.
1979 Ruster Trockenbeerenauslese
(Weiss-Burgunder)
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
All Austrian Wines and Spirits
Vienna, Austria

24.
1982 Donnerskirchner Beerenauslese Bouviertraube
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

25.
1982 Oggauer Welschriesling
(Weinbaugebiet Rust/Neusiedlersee)
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut Ges.M. B. H. Sepp Hold,
St. Georgen, Austria

26.
1982 Hummelberg
Welsch-Riesling
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut GmbH Sepp Hold,
St. Georgen, Austria

27.
1978 Ruster Eiswein Traminer Auslese
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
All Austrian Wines and Spirits
Vienna, Austria

8/29/85 LIST

(page 1) (Updated as of 08/29/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

1.
1982 St. Margarethener Auslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sonne
Urzig/Mosel, Germany

2.
1981 Gumpoldskirchner Doktor Spatlese
Imported by:
Chateau and Estate Wines Comp.
New York, New York
Produced by:
Dr. Ernst Weigl
Gumpoldskirchen, Austria

3.
1982 Weissburgunder
Pinot Blanc Dry Cabinet
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut Sepp Hold,
St. Georgen, Austria

4.
1983 Ruster Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

5.
1981 St. Margarethener Beerenauslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sonne
Urzig/Mosel, Germany

(page 2) (Updated as of 08/29/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

6.
1981 Rust Neusiedlersee Trockenbeerenauslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

7.
1983 Ruster Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

8.
1980 St. Margarethener Trockenbeerenauslese
Imported by:
Niederthaler Hof Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Niederthaler Hof
Schlossbockelheim, West Germany

9.
1979 Breitenbrunner Welschriesling Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

10.
1983 Illmitzer Pelsonecker Beerenauslese - Rose'
(Rose' Wine)
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau GMBH
Burg Layen, West Germany

(page 3) (Updated as of 08/29/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

11.
1983 Illmitzer Kaisergarten Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

12.
1983 Pelser Schillingsberg Eiswein
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

13.
1980 Rust-Neusiedlersee Eiswein Beerenauslese - Rulander
Especially selected for Kane Beverage Mart
Imported by:
Wein-Bauer,
River Grove, Illinois
Shipped by:
Wein-Bauer
Stockerau, Austria

14.
1983 Podersdorfer Kaisergarten Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

15.
1979 Pamhagener
(Rose' Wine)
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

16.
1981 Edelstaler Kaisergarten Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth - Weinkellerei GMBH
Burg Layen, West Germany

17.
1981 Weidener Kaisergarten Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

18.
1980 Edelstaler Kupferhohe Eiswein
(Gewurztraminer)
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany
Bottled by:
Weingut Haller, Monchhof, Austria

19.
1980 Monchhofer Steingang Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Bottled by:
Weingut Haller
Monchhof, Austria

(page 5) (Updated as of 08/29/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

20.
1984 Osterreich Neusiedler See Spatlese
(Karl Walden Selection)
Imported by:
American B. D. Co.
Hawthorne, New Jersey
Bottled by:
Richard Trimborn
Bad Kreuznach, Germany

21.
1982 Pustaqueen
Gruner Veltliner Kabinett
Imported by:
Schlossadler
Garden Grove, California
Bottled and shipped by:
J. Hafner
Monchhof, Austria

22.
1982 Rust Neusiedlersee Spatlese
Imported by:
Schumacher and Sons Distr. Inc.
Chicago, Illinois
Shipped by:
Weinkellerei St. Kunibert GmbH,
Leiwen/Germany

23.
1979 Ruster Trockenbeerenauslese
(Weiss-Burgunder)
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
All Austrian Wines and Spirits
Vienna, Austria

24.
1982 Donnerskirchner Beerenauslese Bouviertraube
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

25.
1982 Oggauer Welschriesling
(Weinbaugebiet Rust/Neusiedlersee)
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut Ges.M. B. H. Sepp Hold,
St. Georgen, Austria

26.
1982 Hummelberg
Welsch-Riesling
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut GmbH Sepp Hold,
St. Georgen, Austria

27.
1978 Ruster Eiswein Traminer Auslese
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
All Austrian Wines and Spirits
Vienna, Austria

28.
1983 Moorhof Hubertushof
Eiswein
Riesling Traminer Med. Dry
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
Weingut Alexander Unger
St. Margarethen, Burgenland, Austria

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

29.
1981 Rust Neusiedlersee
Blaufrankisch Spatlese
(Red Wine)
Imported by:
The Great American Wine Co.
Bridgeport, CT
Selected by:
The Vintage Wine Selections
Bottled and shipped by:
Weink. Johann Pfeiffer, GmbH & Co.
Wittlich, Germany

30.
1983 St. Margarethener
Beerenauslese
Welschriesling
Imported by:
The Great American Wine Co.
Bridgeport, CT
Selected by:
The Vintage Wine Selections
Bottled and shipped by:
Weink. Johann Pfeiffer, GmbH & Co.
Wittlich, Germany

31.
1979 Monchhofer Kaisergarten
Riesling u. Traminer
Beerenauslese
Imported by:
Pieroth Wine Imports Inc.
Franklin Park, Illinois
Bottled and shipped by:
Ferdinand Pieroth
Burg Layen, Germany

32.
1978 Illmitzer Kaisergarten
Weissburgunder
Spatlese
Imported by:
Pieroth Wine Imports Inc.
Franklin Park, Illinois
Bottled and shipped by:
Ferdinand Pieroth
Burg Layen, Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

33.
1979 Ruster Altenberg
Muller Thurgau Auslese
Imported Exclusively by:
Wein Bauer
Chicago, Illinois
Shipped by:
Wein Bauer
Stockerau, Austria

34.
1982 Osterreich Neusiedler See Spatlese
(Karl Walden)
Imported by:
American B. D. Co.
Hawthorne, New Jersey
Bottled by:
Richard Trimborn GmbH
Bad Kreuznach, Germany

35.
1983 Osterreich Neusiedler See Spatlese
(Karl Walden)
Imported by:
American B. D. Co.
Hawthorne, New Jersey
Bottled by:
Richard Trimborn GmbH
Bad Kreuznach, Germany

36.
1981 Rust Neusiedlersee
Trockenbeerenauslese
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Hoffman Imports
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

37.
1982 Falkensteiner
Gruner Veltiner
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Hoffman Imports
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

38.
1982 St. Margarethener
Auslese
Welschriesling
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Carew-Morris Liquor Imports
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

39.
1983 St. Margarethener
Welschriesling Beerenauslese
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Hoffman Import Co., Inc.
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

9/5/85 LIST

PANAFAX COVER SHEET

TO: ALL REGIONAL DIRECTORS (COMPLIANCE)
CHIEFS, FIELD OPERATIONS - PHILADELPHIA & CINCINNATI

FM: Chief Product Compliance

SUBJECT: LIST OF CONTAMINATED AUSTRIAN WINE

PANAFAX #: #8635

NUMBER OF PAGES: 12

REMARKS:

James L. Alford
Chief, Product Compliance

1 of 12

MLS

(page 1) (Updated as of 09/05/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

1.
1982 St. Margarethener Auslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

2.
1981 Gumpoldskirchner Doktor Spatlese
Imported by:
Chateau and Estate Wines Comp.
New York, New York
Produced by:
Dr. Ernst Weigl
Gumpoldskirchen, Austria

3.
1982 Weissburgunder
Pinot Blanc Dry Cabinet
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut Sepp Hold,
St. Georgen, Austria

4.
1981 St. Margarethener Beerenauslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

(Updated as of 09/05/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

5.
1981 Rust Neusiedlersee Trockenbeerenauslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

6.
1983 Ruster Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

7.
1980 St. Margarethener Trockenbeerenauslese
Imported by:
Niederthaler Hof Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Niederthaler Hof
Schlossbockelheim, West Germany

8.
1979 Breitenbrunner Welschriesling Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

9.
1983 Illmitzer Felsonecker Beerenauslese - Rose'
(Rose' Wine)
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau GMBH
Burg Layen, West Germany

(Updated as of 09/05/85)

(page 3)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

10.
1983 Illmitzer Kaisergarten Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

11.
1983 Felser Schillingsberg Eiswein
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

12.
1980 Rust-Neusiedlersee Eiswein Beerenauslese - Rulander
Especially selected for Kane Beverage Mart
Imported by:
Wein-Bauer,
River Grove, Illinois
Shipped by:
Wein-Bauer
Stockerau, Austria

13.
1983 Podersdorfer Kaisergarten Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

14.
1979 Pamhagener
(Rose' Wine)
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

(page 4) **(Updated as of 09/05/85)**

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

15.
1981 Edelstaler Kaisergarten Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth - Weinkellerei GMBH
Burg Layen, West Germany

16.
1981 Weidener Kaisergarten Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

17.
1980 Edelstaler Kupferhohe Eiswein
(Gewurztraminer)
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany
Bottled by:
Weingut Haller, Monchhof, Austria

18.
1980 Monchhofer Steingang Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Bottled by:
Weingut Haller
Monchhof, Austria

(Updated as of 09/05/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

19.
1984 Osterreich Neusiedler See Spatlese
(Karl Walden Selection)
Imported by:
American B. D. Co.
Hawthorne, New Jersey
Bottled by:
Richard Trimborn
Bad Kreuznach, Germany

20.
1982 Pustaqueen
Gruner Veltliner Kabinett
Imported by:
Schlossadler
Garden Grove, California
Bottled and shipped by:
J. Hafner
Monchhof, Austria

21.
1982 Rust Neusiedlersee Spatlese
Imported by:
Schumacher and Sons Distr. Inc.
Chicago, Illinois
Shipped by:
Weinkellerei St. Kunibert GmbH,
Leiwen/Germany

22.
1979 Ruster Trockenbeerenauslese
(Weiss-Burgunder)
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
All Austrian Wines and Spirits
Vienna, Austria

23.
1982 Donnerskirchner Beerenauslese Bouviertraube
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

(page 6) (Updated as of 09/05/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

24.
1982 Oggauer Welschriesling
(Weinbaugebiet Rust/Neusiedlersee)
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut Ges.M. B. H. Sepp Hold,
St. Georgen, Austria

25.
1982 Hummelberg
Welsch-Riesling
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut GmbH Sepp Hold,
St. Georgen, Austria

26.
1978 Ruster Eiswein Traminer Auslese
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
All Austrian Wines and Spirits
Vienna, Austria

27.
1983 Moorhof Hubertushof
Eiswein
Riesling Traminer Med. Dry
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
Weingut Alexander Unger
St. Margarethen, Burgenland, Austria

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

28.
1981 Rust Neusiedlersee
Blaufrankisch Spatlese
(Red Wine)
Imported by:
The Great American Wine Co.
Bridgeport, CT
Selected by:
The Vintage Wine Selections
Bottled and shipped by:
Weink. Johann Pfeiffer, GmbH & Co.
Wittlich, Germany

29.
1983 St. Margarethener
Beerenauslese
Welschriesling
Imported by:
The Great American Wine Co.
Bridgeport, CT
Selected by:
The Vintage Wine Selections
Bottled and shipped by:
Weink. Johann Pfeiffer, GmbH & Co.
Wittlich, Germany

30.
1979 Monchhofer Kaisergarten
Riesling u. Traminer
Beerenauslese
Imported by:
Pieroth Wine Imports Inc.
Franklin Park, Illinois
Bottled and shipped by:
Ferdinand Pieroth
Burg Layen, Germany

31.
1978 Illmitzer Kaisergarten
Weissburgunder
Spatlese
Imported by:
Pieroth Wine Imports Inc.
Franklin Park, Illinois
Bottled and shipped by:
Ferdinand Pieroth
Burg Layen, Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

32.
1979 Ruster Altenberg
Muller Thurgau Auslese
Imported Exclusively by:
Wein Bauer
Chicago, Illinois
Shipped by:
Wein Bauer
Stockerau, Austria

33.
1982 Osterreich Neusiedler See Spatlese
(Karl Walden)
Imported by:
American B. D. Co.
Hawthorne, New Jersey
Bottled by:
Richard Trimborn GmbH
Bad Kreuznach, Germany

34.
1983 Osterreich Neusiedler See Spatlese
(Karl Walden)
Imported by:
American B. D. Co.
Hawthorne, New Jersey
Bottled by:
Richard Trimborn GmbH
Bad Kreuznach, Germany

35.
1981 Rust Neusiedlersee
Trockenbeerenauslese
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Hoffman Imports
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

36.
1982 Falkensteiner
Gruner Veltiner
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Hoffman Imports
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

37.
1982 St. Margarethener
Auslese
Welschriesling
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Carew-Korris Liquor Imports
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

38.
1983 St. Margarethener
Welschriesling Beerenauslese
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Hoffman Import Co., Inc.
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

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AUSTRIAN WINES TESTED AND FOUND
TO CONTAIN DIETHYLENE GLYCOL
(Continued)

39. 1981 Rust Neusiedlersee Traminer Trockenbeerenauslese
Imported by:
The Great American Wine Co.,
Greenwich, Connecticut
Shipped and bottled by:
Johann Pfeiffer,
Urzig/Mosel, Germany

40. 1982 St. Georgener Spatlese Weissburgunder
Sole US Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Carew-Morris Liquor Imports
Moonachie, New Jersey
Bottled and Shipped by:
Weinbau Ewald Pfeiffer,
Urzig/Mosel, Germany

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AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

1.
1982 St. Margarethener Auslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

2.
1981 Gumpoldskirchner Doktor Spatlese
Imported by:
Chateau and Estate Wines Comp.
New York, New York
Produced by:
Dr. Ernst Weigl
Gumpoldskirchen, Austria

3.
1982 Weissburgunder
Pinot Blanc Dry Cabinet
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut Sepp Hold,
St. Georgen, Austria

4.
1981 St. Margarethener Beerenauslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

5.
1981 Rust Neusiedlersee Trockenbeerenauslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

6.
1983 Ruster Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

7.
1980 St. Margarethener Trockenbeerenauslese
Imported by:
Niederthaler Hof Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Niederthaler Hof
Schlossbockelheim, West Germany

8.
1979 Breitenbrunner Welschriesling Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

9.
1983 Illmitzer Felsonecker Beerenauslese - Rose'
(Rose' Wine)
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau GMBH
Burg Layen, West Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

10.
1983 Illmitzer Kaisergarten Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

11.
1983 Felser Schillingsberg Eiswein
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

12.
1980 Rust-Neusiedlersee Eiswein Beerenauslese - Rulander
Especially selected for Kane Beverage Mart
Imported by:
Wein-Bauer,
River Grove, Illinois
Shipped by:
Wein-Bauer
Stockerau, Austria

13.
1983 Podersdorfer Kaisergarten Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

14.
1979 Pamhagener
(Rose' Wine)
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

(page 4) (Updated as of 09/20/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

15.
1981 Edelstaler Kaisergarten Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth - Weinkellerei GMBH
Burg Layen, West Germany

16.
1981 Weidener Kaisergarten Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

17.
1980 Edelstaler Kupferhohe Eiswein
(Gewurztraminer)
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany
Bottled by:
Weingut Haller, Monchhof, Austria

18.
1980 Monchhofer Steingang Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Bottled by:
Weingut Haller
Monchhof, Austria

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

19.
1984 Osterreich Neusiedler See Spatlese
(Karl Walden Selection)
Imported by:
American B. D. Co.
Hawthorne, New Jersey
Bottled by:
Richard Trimborn
Bad Kreuznach, Germany

20.
1982 Pustaqueen
Gruner Veltliner Kabinett
Imported by:
Schlossadler
Garden Grove, California
Bottled and shipped by:
J. Hafner
Monchhof, Austria

21.
1982 Rust Neusiedlersee Spatlese
Imported by:
Schumacher and Sons Distr. Inc.
Chicago, Illinois
Shipped by:
Weinkellerei St. Kunibert GmbH,
Leiwen/Germany

22.
1979 Ruster Trockenbeerenauslese
(Weiss-Burgunder)
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
All Austrian Wines and Spirits
Vienna, Austria

23.
1982 Donnerskirchner Beerenauslese Bouviertraube
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

(page 6) (Updated as of 09/20/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

24.
1982 Oggauer Welschriesling
(Weinbaugebiet Rust/Neusiedlersee)
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut Ges.M. B. H. Sepp Hold,
St. Georgen, Austria

25.
1982 Hummelberg
Welsch-Riesling
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut GmbH Sepp Hold,
St. Georgen, Austria

26.
1978 Ruster Eiswein Traminer Auslese
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
All Austrian Wines and Spirits
Vienna, Austria

27.
1983 Moorhof Hubertushof
Eiswein
Riesling Traminer Med. Dry
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
Weingut Alexander Unger
St. Margarethen, Burgenland, Austria

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

28.
1981 Rust Neusiedlersee
Blaufrankisch Spatlese
(Red Wine)
Imported by:
The Great American Wine Co.
Bridgeport, CT
Selected by:
The Vintage Wine Selections
Bottled and shipped by:
Weink. Johann Pfeiffer, GmbH & Co.
Wittlich, Germany

29.
1983 St. Margarethener
Beerenauslese
Welschriesling
Imported by:
The Great American Wine Co.
Bridgeport, CT
Selected by:
The Vintage Wine Selections
Bottled and shipped by:
Weink. Johann Pfeiffer, GmbH & Co.
Wittlich, Germany

30.
1979 Monchhofer Kaisergarten
Riesling u. Traminer
Beerenauslese
Imported by:
Pieroth Wine Imports Inc.
Franklin Park, Illinois
Bottled and shipped by:
Ferdinand Pieroth
Burg Layen, Germany

31.
1978 Illmitzer Kaisergarten
Weissburgunder
Spatlese
Imported by:
Pieroth Wine Imports Inc.
Franklin Park, Illinois
Bottled and shipped by:
Ferdinand Pieroth
Burg Layen, Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

32.
1979 Ruster Altenberg
Muller Thurgau Auslese
Imported exclusively by:
Wein Bauer
   Chicago, Illinois
Shipped by:
Wein Bauer
   Stockerau, Austria

33.
1982 Osterreich Neusiedler See Spatlese
(Karl Walden)
Imported by:
American B. D. Co.
   Hawthorne, New Jersey
Bottled by:
Richard Trimborn GmbH
   Bad Kreuznach, Germany

34.
1983 Osterreich Neusiedler See Spatlese
(Karl Walden)
Imported by:
American B. D. Co.
   Hawthorne, New Jersey
Bottled by:
Richard Trimborn GmbH
   Bad Kreuznach, Germany

35.
1981 Rust Neusiedlersee
Trockenbeerenauslese
Sole U.S. Agent:
The Great American Wine Co.
      Bridgeport, CT
Imported by:
Hoffman Imports
   Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
      Urzig/Mosel, Germany

(page 9) (Updated as of 09/20/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

36.
1982 Falkensteiner
Gruner Veltiner
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Hoffman Imports
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

37.
1982 St. Margarethener
Auslese
Welschriesling
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Carew-Morris Liquor Imports
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

38.
1983 St. Margarethener
Welschriesling Beerenauslese
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Hoffman Import Co., Inc.
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

39. 1981 Rust Neusiedlersee Traminer Trockenbeerenauslese
Imported by:
The Great American Wine Co.,
Greenwich, Connecticut
Shipped and bottled by:
Johann Pfeiffer,
Urzig/Mosel, Germany

40. 1982 St. Georgener Spatlese Weissburgunder
Sole US Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Carew-Morris Liquor Imports
Moonachie, New Jersey
Bottled and Shipped by:
Weinbau Ewald Pfeiffer,
Urzig/Mosel, Germany

41. 1982 Falkensteiner Gruner Veltliner Qualitatswein
Imported by:
Viviano Wine Importers, Inc. ?
Detroit, Michigan
Bottled and Shipped by:
St. Charles Weinkellerei GmbH,
Bernkasel-Kues, Germany

42. 1981 Rust Neusiedlersee Trockenbeerenauslese
Imported by:
Viviano Wine Importers, Inc
Detroit, Michigan - ?
Bottled and Shipped by:
St.Charles Weinkellerei GmbH,
Bernkasel-Kues, Germany

10/4/85 LIST

PANAFAX COVER SHEET

[illegible] ALCOHOL, TOBACCO [illegible] FIREARMS
[illegible] CENTER

TO: All REGIONAL DIRECTORS (COMPLIANCE) PR And Chiefs, Field Operations, CINCINNATI AND Philadelphia

FR: Chief, PRODUCT COMPLIANCE

SUBJECT: UPDATED LIST - CONTAMINATED AUSTRIAN Wines

PANAFAX #: 9730

NUMBER OF PAGES: 13

REMARKS:

Thomas Alford
Chief, Product Compliance

1-13

SENT
AF

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AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

1.
1982 St. Margarethener Auslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

2.
1981 Gumpoldskirchner Doktor Spatlese
Imported by:
Chateau and Estate Wines Comp.
New York, New York
Produced by:
Dr. Ernst Weigl
Gumpoldskirchen, Austria

3.
1982 Weissburgunder
Pinot Blanc Dry Cabinet
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut Sepp Hold,
St. Georgen, Austria

4.
1981 St. Margarethener Beerenauslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

5.
1981 Rust Neusiedlersee Trockenbeerenauslese
Imported by:
The Great American Wine Co.
Bridgeport, CT
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

6.
1983 Ruster Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

7.
1980 St. Margarethener Trockenbeerenauslese
Imported by:
Niederthaler Hof Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Niederthaler Hof
Schlossbockelheim, West Germany

8.
1979 Breitenbrunner Welschriesling Beerenauslese
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

9.
1983 Illmitzer Felsenecker Beerenauslese - Rose'
(Rose' Wine)
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau GMBH
Burg Layen, West Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

10.
1983 Illmitzer Kaisergarten Beerenauslese
Imported by:
Pieroth Wine Imports Co.
   Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
   Burg Layen, West Germany

11.
1983 Felser Schillingsberg Eiswein
Imported by:
Pieroth Wine Imports Co.
   Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
   Burg Layen, West Germany

12.
1980 Rust-Neusiedlersee Eiswein Beerenauslese - Rulander
Especially selected for Kane Beverage Mart
Imported by:
Wein-Bauer,
   River Grove, Illinois
Shipped by:
Wein-Bauer
   Stockerau, Austria

13.
1983 Podersdorfer Kaisergarten Beerenauslese
Imported by:
Pieroth Wine Imports Co.
   Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
   Burg Layen, West Germany

14.
1979 Pamhagener
(Rose' Wine)
Imported by:
Pieroth Wine Imports Co.
   Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
   Burg Layen, West Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

15.
1981 Edelstaler Kaisergarten Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
   Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth - Weinkellerei GMBH
   Burg Layen, West Germany

16.
1981 Weidener Kaisergarten Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
   Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
   Burg Layen, West Germany

17.
1980 Edelstaler Kupferhohe Eiswein
(Gewurztraminer)
Imported by:
Pieroth Wine Imports Co.
   Franklin Park, Illinois
Shipped by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
   Burg Layen, West Germany
Bottled by:
Weingut Haller, Monchhof, Austria

18.
1980 Monchhofer Steingang Trockenbeerenauslese
Imported by:
Pieroth Wine Imports Co.
   Franklin Park, Illinois
Bottled by:
Weingut Haller
   Monchhof, Austria

(page 5) (Updated as of 10/04/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

19.
1984 Osterreich Neusiedler See Spatlese
(Karl Walden Selection)
Imported by:
American B. D. Co.
Hawthorne, New Jersey
Bottled by:
Richard Trimborn
Bad Kreuznach, Germany

20.
1982 Pustaqueen
Gruner Veltliner Kabinett
Imported by:
Schlossadler
Garden Grove, California
Bottled and shipped by:
J. Hafner
Monchhof, Austria

21.
1982 Rust Neusiedlersee Spatlese
Imported by:
Schumacher and Sons Distr. Inc.
Chicago, Illinois
Shipped by:
Weinkellerei St. Kunibert GmbH,
Leiwen/Germany

22.
1979 Ruster Trockenbeerenauslese
(Weiss-Burgunder)
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
All Austrian Wines and Spirits
Vienna, Austria

23.
1982 Donnerskirchner Beerenauslese Bouviertraube
Imported by:
Pieroth Wine Imports Co.
Franklin Park, Illinois
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

24.
1982 Oggauer Welschriesling
(Weinbaugebiet Rust/Neusiedlersee)
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut Ges.M. B. H. Sepp Hold,
St. Georgen, Austria

25.
1982 Hummelberg
Welsch-Riesling
Imported by:
Interport Corporation,
Ashland, Virginia
Produced by:
Weingut GmbH Sepp Hold,
St. Georgen, Austria

26.
1978 Ruster Eiswein Traminer Auslese
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
All Austrian Wines and Spirits
Vienna, Austria

27.
1983 Moorhof Hubertushof
Eiswein
Riesling Traminer Med. Dry
Imported by:
Dieder Steinman, Inc.
Glendale, New York
Shipped by:
Weingut Alexander Unger
St. Margarethen, Burgenland, Austria

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

28.
1981 Rust Neusiedlersee
Blaufrankisch Spatlese
(Red Wine)
Imported by:
The Great American Wine Co.
Bridgeport, CT
Selected by:
The Vintage Wine Selections
Bottled and shipped by:
Weink. Johann Pfeiffer, GmbH & Co.
Wittlich, Germany

29.
1983 St. Margarethener
Beerenauslese
Welschriesling
Imported by:
The Great American Wine Co.
Bridgeport, CT
Selected by:
The Vintage Wine Selections
Bottled and shipped by:
Weink. Johann Pfeiffer, GmbH & Co.
Wittlich, Germany

30.
1979 Monchhofer Kaisergarten
Riesling u. Traminer
Beerenauslese
Imported by:
Pieroth Wine Imports Inc.
Franklin Park, Illinois
Bottled and shipped by:
Ferdinand Pieroth
Burg Layen, Germany

31.
1978 Illmitzer Kaisergarten
Weissburgunder
Spatlese
Imported by:
Pieroth Wine Imports Inc.
Franklin Park, Illinois
Bottled and shipped by:
Ferdinand Pieroth
Burg Layen, Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

32.
1979 Ruster Altenberg
Muller Thurgau Auslese
Imported Exclusively by:
Wein Bauer
Chicago, Illinois
Shipped by:
Wein Bauer
Stockerau, Austria

33.
1982 Osterreich Neusiedler See Spatlese
(Karl Walden)
Imported by:
American B. D. Co.
Hawthorne, New Jersey
Bottled by:
Richard Trimborn GmbH
Bad Kreuznach, Germany

34.
1983 Osterreich Neusiedler See Spatlese
(Karl Walden)
Imported by:
American B. D. Co.
Hawthorne, New Jersey
Bottled by:
Richard Trimborn GmbH
Bad Kreuznach, Germany

35.
1981 Rust Neusiedlersee
Trockenbeerenauslese
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Hoffman Imports
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

36.
1982 Falkensteiner
Gruner Veltiner
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Hoffman Imports
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

37.
1982 St. Margarethener
Auslese
Welschriesling
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Carew-Morris Liquor Imports
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

38.
1983 St. Margarethener
Welschriesling Beerenauslese
Sole U.S. Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Hoffman Import Co., Inc.
Moonachie, New Jersey
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

39. 1981 Rust Neusiedlersee Traminer Trockenbeerenauslese
Imported by:
The Great American Wine Co.,
Greenwich, Connecticut
Shipped and bottled by:
Johann Pfeiffer,
Urzig/Mosel, Germany

40. 1982 St. Georgener Spatlese Weissburgunder
Sole US Agent:
The Great American Wine Co.
Bridgeport, CT
Imported by:
Carew-Morris Liquor Imports
Moonachie, New Jersey
Bottled and Shipped by:
Weinbau Ewald Pfeiffer,
Urzig/Mosel, Germany

41. 1982 Falkensteiner Gruner Veltliner Qualitatswein
Imported by:
Viviano Wine Importers, Inc.
Detroit, Michigan
Bottled and Shipped by:
St. Charles Weinkellerei GmbH,
Bernkasel-Kues, Germany

42. 1981 Rust Neusiedlersee Trockenbeerenauslese
Imported by:
Viviano Wine Importers, Inc
Detroit, Michigan
Bottled and Shipped by:
St.Charles Weinkellerei GmbH,
Bernkasel-Kues, Germany

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43. 1983 St. Margarethener Beerenauslese Welschriesling
Imported by:
The Great American Wine Co.
Bridgeport, CT
Selected by:
The Vintage Wine Selections
Bottled and Shipped by:
Weinbau Ewald Pfeiffer,
Urzig/Mosel, Germany

44. 1979 Halbturner Kupferfels Auslese - Eiswein
Imported by:
Kepp Wine Imports Co.
Franklin Park, IL
Bottled by:
Weingut Haller,
Monchhof, Austria
Shipped by:
Ferdinand Pieroth GmbH,
Burg Layen, West Germany

45. 1980 Frauenkirchner Steingang Eiswein
Imported by:
Pieroth Wine Imports
Franklin Park, IL
Bottled and Shipped by:
Weingut Morhof,
St. Margarethin, Austria

2/21/86 LIST

PANAFAX COVER SHEET

TO: ALL REGIONAL DIRECTORS (COMPLIANCE)
CHIEF, FIELD OPERATIONS (CINCINNATI)
CHIEF, FIELD OPERATIONS (PHILADELPHIA)

FM: CHIEF, PRODUCT COMPLIANCE BRANCH

SUBJECT: List of Wines Found by ATF to Contain Diethylene Glycol

PANAFAX #: 01527

NUMBER OF PAGES: 15

REMARKS: As a result of a recent WCBS-TV interview with Deputy Director Drake, we are currently receiving numerous requests for a list of wines found by ATF to contain diethylene glycol. Attached is an up-to-date list which may be provided to persons who request this information. Also, please provide copies to ALL Area Offices.

Chief, Product Compliance

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(page 1) (Updated as of 00/00/86)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION

1.
1982 St. Margarethener Auslese
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

2.
1981 Gumpoldskirchner Doktor Spatlese
Produced by:
Dr. Ernst Weigl
Gumpoldskirchen, Austria

3.
1982 Weissburgunder
Pinot Blanc Dry Cabinet
Produced by:
Weingut Sepp Hold,
St. Georgen, Austria

4.
1981 St. Margarethener Beerenauslese
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

5.
1981 Rust Neusiedlersee Trockenbeerenauslese
Shipped and bottled by:
Weinkellerei Jos. v. Dawen Sohne
Urzig/Mosel, Germany

6.
1983 Ruster Beerenauslese
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

7.
1980 St. Margarethener Trockenbeerenauslese
Shipped and bottled by:
Niederthaler Hof
Schlossbockelheim, West Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

(Continued)

DESCRIPTION

8.
1979 Breitenbrunner Welschriesling
Beerenauslese
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen West Germany

9.
1983 Illmitzer Felsonecker
Beerenauslese - Rose'
(Rose' Wine)
Shipped and bottled by:
Ferdinand Pieroth Weinbau GMBH
Burg Layen, West Germany

10.
1983 Illmitzer Kaisergarten Beerenauslese
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

11.
1983 Felser Schillingsberg Eiswein
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

12.
1980 Rust-Neusiedlersee
Eiswein Beerenauslese - Rulander
Shipped by:
Wein-Bauer
Stockerau, Austria

13.
1983 Podersdorfer Kaisergarten Beerenauslese
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION

14.
1979 Pamhagener
(Rose' Wine)
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

15.
1981 Edelstaler Kaisergarten
Trockenbeerenauslese
Shipped and bottled by:
Ferdinand Pieroth - Weinkellerei GMBH
Burg Layen, West Germany

16.
1981 Weidener Kaisergarten
Trockenbeerenauslese
Shipped and bottled by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany

17.
1980 Edelstaler Kupferhohe Eiswein
(Gewurztraminer)
Shipped by:
Ferdinand Pieroth Weinbau - Weinkellerei GMBH
Burg Layen, West Germany
Bottled by:
Weingut Haller, Monchhof, Austria

18.
1980 Monchhofer Steingang Trockenbeerenauslese
Bottled by:
Weingut Haller
Monchhof, Austria

19.
1984 Osterreich Neusiedler See Spatlese
(Karl Walden Selection)
Bottled by:
Richard Trimborn
Bad Kreuznach, Germany

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(Updated as of 00/00/85)

AUSTRIAN WINES TESTED AND FOUND
TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION

20.
1982 Pustaqueen
Gruner Veltliner Kabinett
Bottled and shipped by:
J. Hafner
Monchhof, Austria

21.
1982 Rust Neusiedlersee Spatlese
Shipped by:
Weinkellerei St. Kunibert GmbH,
Leiwen/Germany

22.
1979 Ruster Trockenbeerenauslese
(Weiss-Burgunder)
Shipped by:
All Austrian Wines and Spirits
Vienna, Austria

23.
1982 Donnerskirchner Beerenauslese
Bouviertraube
Shipped and bottled by:
Ferdinand Pieroth GMBH
Burg Layen, West Germany

24.
1982 Oggauer Welschriesling
(Weinbaugebiet Rust/Neusiedlersee)
Produced by:
Weingut Ges.M. B. H. Sepp Hold,
St. Georgen, Austria

25.
1982 Hummelberg
Welsch-Riesling
Produced by:
Weingut GmbH Sepp Hold,
St. Georgen, Austria

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION

26.
1978 Ruster Eiswein Traminer Auslese
Shipped by:
All Austrian Wines and Spirits
Vienna, Austria

27.
1983 Moorhof Hubertushof
Eiswein
Riesling Traminer Med. Dry
Shipped by:
Weingut Alexander Unger
St. Margarethen, Burgenland, Austria

28.
1981 Rust Neusiedlersee
Blaufrankisch Spatlese
(Red Wine)
Selected by:
The Vintage Wine Selections
Bottled and shipped by:
Weink. Johann Pfeiffer, GmbH & Co.
Wittlich, Germany

29.
1983 St. Margarethener
Beerenauslese
Welschriesling
Selected by:
The Vintage Wine Selections
Bottled and shipped by:
Weink. Johann Pfeiffer, GmbH & Co.
Wittlich, Germany

30.
1979 Monchhofer Kaisergarten
Riesling u. Traminer
Beerenauslese
Bottled and shipped by:
Ferdinand Pieroth
Burg Layen, Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

(Continued)

DESCRIPTION

31.
1978 Illmitzer Kaisergarten
Weissburgunder
Spatlese
Bottled and shipped by:
Ferdinand Pieroth
Burg Layen, Germany

32.
1979 Ruster Altenberg
Muller Thurgau Auslese
Shipped by:
Wein Bauer
Stockerau, Austria

33.
1982 Osterreich Neusiedler See Spatlese
(Karl Walden)
Bottled by:
Richard Trimborn GmbH
Bad Kreuznach, Germany

34.
1983 Osterreich Neusiedler See Spatlese
(Karl Walden)
Bottled by:
Richard Trimborn GmbH
Bad Kreuznach, Germany

35.
1981 Rust Neusiedlersee
Trockenbeerenauslese
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

36.
1982 Falkensteiner
Gruner Veltiner
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION

37.
1982 St. Margarethener
Auslese
Welschriesling
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

38.
1983 St. Margarethener
Welschriesling Beerenauslese
Bottled and shipped by:
Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

39. 1981 Rust Neusiedlersee Traminer
Trockenbeerenauslese
Shipped and bottled by:
Johann Pfeiffer,
Urzig/Mosel, Germany

40. 1982 St. Georgener Spatlese
Weissburgunder
Bottled and Shipped by:
Weinbau Ewald Pfeiffer,
Urzig/Mosel, Germany

41. 1982 Falkensteiner Gruner Veltliner
Qualitatswein
Bottled and Shipped by:
St. Charles Weinkellerei GmbH,
Bernkasel-Kues, Germany

42. 1981 Rust Neusiedlersee
Trockenbeerenauslese
Bottled and Shipped by:
St.Charles Weinkellerei GmbH,
Bernkasel-Kues, Germany

(page 8) (Updated as of 00/00/86)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION

43. 1983 St. Margarethener Beerenauslese
Welschriesling
Selected by:
The Vintage Wine Selections
Bottled and Shipped by:
Weinbau Ewald Pfeiffer
Urzig/Mosel, Germany

44. 1979 Halbturner Kupferfels
Auslese - Eiswein
Bottled by:
Weingut Haller,
Monchhof, Austria
Shipped by:
Ferdinand Pieroth GmbH,
Burg Layen, West Germany

45. 1980 Frauenkirchner Steingang Eiswein
Bottled and Shipped by:
Weingut Morhof,
St. Margarethin, Austria

46.
1979 Retzer Altenberg
Gruner Veltliner
Serial No. CH-79-001
White Wine
Produced by:
Wein-Bauer, Stockerau, Austria

47.
1979 Gumpoldskirchner Rotgipfler
White Wine
Serial No. CH-79-004
Produced by:
Wein-Bauer, Stockerau, Austria

48.
1979 Altenberg Riesling
White Wine
Serial No. CH-79-003
Produced by:
Wein-Bauer, Stockerau, Austria

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION

49.
1979 Rust Altenberg
Red Light Wine
Serial No. CH-79-005
Produced by:
Wein-Bauer Stockerau, Austria

50.
1981 Bouvier Trockenbeerenauslese
Region Rust-Neusiedlersee
Bottled and Shipped by:
Bruder Grill Weingut
Fels-Krems, Austria

51.
1982 Muskat Ottonel Auslese
Region Rust-Neusiedlersee
Bottled and Shipped by:
Bruder Grill Weingut
Fels-Krems, Austria

52.
1982 Gruner Veltliner Spatlese
Region Klosterneuberg
Bottled and Shipped by:
Bruder Grill Weingut
Fels-Krems, Austria

53.
1982 St. Georgener Spatlese
Burgenland - Rust-Neusiedlersee
Bottled in Neumagen-Dhron, and
Shipped by Intergena KG, Weinkellerei,
Schermbeck/Reinland - West Germany

54.
1978 Kirchberger Konigsbutt
Gruner-Veltline
Eiswein-Beerenauslese
Bottled By:
Ferdinand Pieroth
Burg Layen, West Germany

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(page 1) (Updated as of 00/00/86)

GERMAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION

1.
1984 Haus of Franz Liebfraumilch
Rheinpfalz
Qualitatswein A.P. No. 5 907 021 518 84
Shipped by: Abfuller Weinkellerei Johann Falkenburg GmbH.
Bernkastel-Kues

2.
1984 Haus of Franz Liebfraumilch
Nahe
Qualitatswein A.P. No. 1 907 021 129 84
Shipped By: Abfuller Weinkellerei
Johann Falkenberg GMBH
Bernkastel - Kues

3.
1984 Haus Frickenstein Liebfraumilch
Nahe
Qualitatswein A.P. No. 1 907 021 29 84
Shipped by: C.A. Warren GmbH. & Co. KG.,
Essen
Bottled by: Abfuller Sommerauer Schlosbergkellerei GmbH.,
Sommerau Abfullort Bernkastel-Kues

4.
1982 Wolfsheimer Abtey Kabinett
Rheinhessen
Qualitatswein A.P. No. 4 907 183 109 84
Bottled by: Ferdinand Pieroth GmbH Weinbau-Weinkellerei
Burg Layen

5.
1983 Saulheimer Domherr Eiswein
Rheinhessen
Qualitatswein A.P. No. 4 907 183 108 84
Bottled by: Phillipp und Heinrich Baum Weinkellerei GmbH
Bad Kreuznach

6.
1979 Westhofener Berkloster Auslese
A.P. No. 4 907 183 27 80
Bottled By: Ferdinand Pieroth
Burg Layen, West Germany

(page 2) (Updated as of 00/00/86)

GERMAN WINES TESTED AND FOUND
TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION

7.
1984 Bad Durkheimer Feuerberg Kabinett
A.P. No. 5 907 183 66 85
Bottled By: Ferdinand Pieroth GMBH
Weinbau-Weinkellerei
Burglayen, West Germany

(page 1) (Updated as of 00/00/86)

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION

1.
1981 Barbera D'Asti
Bottled By: F. Lli Dogliani S.p.A.
La Morra, Italy

2.
1980 Barbaresco
Bottled By: F. Lli Dogliani S.p.A.
La Morra, Italy

3.
Kiola Barola
Bottled By: FDO S.p.A.
La Morra, Italy

4.
1973 Gattinara
Bottled By: F. Lli Dogliani S.p.A.
La Morra, Italy

5.
Lambrusco
Bottled By: Spabis S.p.A.
Calmasino, Italy

6.
Asti Spumante
Bottled By: F. Lli Dogliani S.p.A.
La Morra, Italy

7.
D'Aquino Barbera D'Asti
Bottled By: F. Lli Dogliani S.p.A.
La Morra, Italy

8.
Kiola Barbaresco
Bottled By: FDO S.p.A.
La Morra, Italy

9.
Riunite Bianco - Code No. 1124/RE
Bottled By: Cantine Coop. Riunite
Reggio Emilia

(page 2) (Updated as of 00/00/86)

ITALIAN WINES TESTED AND FOUND
TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION

10.
Riunite Rosato - Code Nos. 1124/RE & 3321/BR
Bottled By: Cantine Coop. Riunite
Reggio Emilia

11.
Riunite Lambrusco dell Emilia - Code No. 1124/RE
Bottled By: Cantine Coop. Riunite
Reggio Emilia

12.
Riunite Spumante - Code No. 313/RE
Bottled By: Cantine Coop. Riunite
Reggio Emilia

13.
1979 D'Aquino Barbaresco
Bottled By: F. Lli Dogliani S.p.A.
La Morra - Piedmont

14.
1981 Valenti Barbaresco
Bottled By: FDO S.p.A.
La Morra, Italy

15.
1983 Valenti Barbera d'Alba
Bottled By: FDO S.p.A.
La Morra, Italy

16.
1980 Valenti Barola
Bottled By: FDO S.p.A.
La Morra, Italy

17.
1981 Spanna Del Piemonte
Bottled By: Azienda Vinicola
Castello Di Lozzolo
Lozzolo, Italia

18.
1973 Valenti Gattinara
Bottled By: FDO S.p.A.
La Morra, Italy

(page 3) (Updated as of 00/00/86)

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION

19.
1979 Valenti Barola Riserva
Bottled By: FDO S.p.A.
La Morra, Italy

20.
1984 Contess[illegible] Vino da Tavola
Vino rosa, Toscana
Bottled By: Ferdinand Pieroth
Weinbau-Weinkellerei GMBH
Burg Layen, West Germany

21.
1982 la Nebbia
bianco
della provincia di Sondrio
Bottled By:
Imbottigliato dalla Casa Vinicola
Enologica Valtellinese
s. p. a.
Sondrio, Italy

22.
1983 Castelvecio
SOAVE Classico
Denominazione Di Origine Controllata
Bottled By:
Casa Vinicola V.B.T. S.p.a.
Calmasino, Italy

23.
1983 Vietti
Moscato Del Piemonte
mosto d'uva parzialmente fermentato
IMB. SES - Castiglione T - R.I 2881/1 CN
Bottled By:
Dalle Cantine Vietti Castiglione Falletto

24.
1983 Vietti
vino da tavola barbera del Piemonte
Bottled By:
Vietti Castiglione Falletto

7/1/86 LIST

List by
Importer and Foreign
Shipper/Producer/Bottler
with DEG Content

page 1) (Updated as of 07/01/86)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
1. 1982 St. Margarethener Auslese Imported by: The Great American Wine Co. Bridgeport, CT Shipped and bottled by: Weinkellerei Jos. v. Dawen Sohne Urzig/Mosel, Germany	0.5 g/liter
2. 1981 Gumpoldskirchner Doktor Spatlese Imported by: Chateau and Estate Wines Comp. New York, New York Produced by: Dr. Ernst Weigl Gumpoldskirchen, Austria	2.2 g/liter
3. 1982 Weissburgunder Pinot Blanc Dry Cabinet Imported by: Interport Corporation, Ashland, Virginia Produced by: Weingut Sepp Hold, St. Georgen, Austria	0.5 g/liter
4. 1981 St. Margarethener Beerenauslese Imported by: The Great American Wine Co. Bridgeport, CT Shipped and bottled by: Weinkellerei Jos. v. Dawen Sohne Urzig/Mosel, Germany	0.9 g/liter

(page 2) (Updated as of 07/01/86)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
5. 1981 Rust Neusiedlersee Trockenbeerenauslese Imported by: The Great American Wine Co. Bridgeport, CT Shipped and bottled by: Weinkellerei Jos. v. Dawen Sohne Urzig/Mosel, Germany	8.8 g/liter
6. 1983 Ruster Beerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth Weinbau - Weinkellerei GMBH Burg Layen, West Germany	1.1 g/liter
7. 1980 St. Margarethener Trockenbeerenauslese Imported by: Niederthaler Hof Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Niederthaler Hof Schlossbockelheim, West Germany	6.6 g/liter
8. 1979 Breitenbrunner Welschriesling Beerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth GMBH Burg Layen, West Germany	2.5 g/liter
9. 1983 Illmitzer Felsonecker Beerenauslese - Rose' (Rose' Wine) Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth Weinbau GMBH Burg Layen, West Germany	0.9 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
10. 1983 Illmitzer Kaisergarten Beerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth GMBH Burg Layen, West Germany	0.9 g/liter
11. 1983 Felser Schillingsberg Eiswein Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth Weinbau - Weinkellerei GMBH Burg Layen, West Germany	4.9 g/liter
12. 1980 Rust-Neusiedlersee Eiswein Beerenauslese - Rulander Especially selected for Kane Beverage Mart Imported by: Wein-Bauer, River Grove, Illinois Shipped by: Wein-Bauer Stockerau, Austria	5.5 g/liter
13. 1983 Podersdorfer Kaisergarten Beerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth Weinbau - Weinkellerei GMBH Burg Layen, West Germany	0.2 g/liter
14. 1979 Pamhagener (Rose' Wine) Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth Weinbau - Weinkellerei GMBH Burg Layen, West Germany	2.0 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
15. 1981 Edelstaler Kaisergarten Trockenbeerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth - Weinkellerei GMBH Burg Layen, West Germany	3.57 g/liter
16. 1981 Weidener Kaisergarten Trockenbeerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth Weinbau - Weinkellerei GMBH Burg Layen, West Germany	3.5 g/liter
17. 1980 Edelstaler Kupferhohe Eiswein (Gewurztraminer) Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped by: Ferdinand Pieroth Weinbau - Weinkellerei GMBH Burg Layen, West Germany Bottled by: Weingut Haller, Monchhof, Austria	
18. 1980 Monchhofer Steingang Trockenbeerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Bottled by: Weingut Haller Monchhof, Austria	

AUSTRIAN WINES TESTED AND FOUND
TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
19. 1984 Osterreich Neusiedler See Spatlese (Karl Walden Selection) Imported by: American B. D. Co. Hawthorne, New Jersey Bottled by: Richard Trimborn Bad Kreuznach, Germany	.2 g/liter
20. 1982 Pustaqueen Gruner Veltliner Kabinett Imported by: Schlossadler Garden Grove, California Bottled and shipped by: J. Hafner Monchhof, Austria	.1 g/liter
21. 1982 Rust Neusiedlersee Spatlese Imported by: Schumacher and Sons Distr. Inc. Chicago, Illinois Shipped by: Weinkellerei St. Kunibert GmbH, Leiwen/Germany	5.6 g/liter
22. 1979 Ruster Trockenbeerenauslese (Weiss-Burgunder) Imported by: Dieder Steinman, Inc. Glendale, New York Shipped by: All Austrian Wines and Spirits Vienna, Austria	16.0 g/liter
23. 1982 Donnerskirchner Beerenauslese Bouviertraube Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth GMBH Burg Layen, West Germany	2.0 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
24. 1982 Oggauer Welschriesling (Weinbaugebiet Rust/Neusiedlersee) Imported by: Interport Corporation, Ashland, Virginia Produced by: Weingut Ges.M. B. H. Sepp Hold, St. Georgen, Austria	.5 g/liter
25. 1982 Hummelberg Welsch-Riesling Imported by: Interport Corporation, Ashland, Virginia Produced by: Weingut GmbH Sepp Hold, St. Georgen, Austria	.5 g/liter
26. 1978 Ruster Eiswein Traminer Auslese Imported by: Dieder Steinman, Inc. Glendale, New York Shipped by: All Austrian Wines and Spirits Vienna, Austria	1.5 g/liter
27. 1983 Moorhof Hubertushof Eiswein Riesling Traminer Med. Dry Imported by: Dieder Steinman, Inc. Glendale, New York Shipped by: Weingut Alexander Unger St. Margarethen, Burgenland, Austria	.1 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
28. 1981 Rust Neusiedlersee Blaufrankisch Spatlese (Red Wine) Imported by: The Great American Wine Co. Bridgeport, CT Selected by: The Vintage Wine Selections Bottled and shipped by: Weink. Johann Pfeiffer, GmbH & Co. Wittlich, Germany	.7 g/liter
29. 1983 St. Margarethener Beerenauslese Welschriesling Imported by: The Great American Wine Co. Bridgeport, CT Selected by: The Vintage Wine Selections Bottled and shipped by: Weink. Johann Pfeiffer, GmbH & Co. Wittlich, Germany	2.8 g/liter
30. 1979 Monchhofer Kaisergarten Riesling u. Traminer Beerenauslese Imported by: Pieroth Wine Imports Inc. Franklin Park, Illinois Bottled and shipped by: Ferdinand Pieroth Burg Layen, Germany	.1 g/liter
31. 1978 Illmitzer Kaisergarten Weissburgunder Spatlese Imported by: Pieroth Wine Imports Inc. Franklin Park, Illinois Bottled and shipped by: Ferdinand Pieroth Burg Layen, Germany	2.6 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
32. 1979 Ruster Altenberg Muller Thurgau Auslese Imported Exclusively by: Wein Bauer Chicago, Illinois Shipped by: Wein Bauer Stockerau, Austria	4.1 g/liter
33. 1982 Osterreich Neusiedler See Spatlese (Karl Walden) Imported by: American B. D. Co. Hawthorne, New Jersey Bottled by: Richard Trimborn GmbH Bad Kreuznach, Germany	2.6 g/liter
34. 1983 Osterreich Neusiedler See Spatlese (Karl Walden) Imported by: American B. D. Co. Hawthorne, New Jersey Bottled by: Richard Trimborn GmbH Bad Kreuznach, Germany	5.8 g/liter
35. 1981 Rust Neusiedlersee Trockenbeerenauslese Sole U.S. Agent: The Great American Wine Co. Bridgeport, CT Imported by: Hoffman Imports Moonachie, New Jersey Bottled and shipped by: Weinbau Ewald Pfeiffer, GmbH Urzig/Mosel, Germany	1.1 g/liter

AUSTRIAN WINES TESTED AND FOUND
TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
36. 1982 Falkensteiner Gruner Veltiner Sole U.S. Agent: The Great American Wine Co. Bridgeport, CT Imported by: Hoffman Imports Moonachie, New Jersey Bottled and shipped by: Weinbau Ewald Pfeiffer, GmbH Urzig/Mosel, Germany	5.0 g/liter
37. 1982 St. Margarethener Auslese Welschriesling Sole U.S. Agent: The Great American Wine Co. Bridgeport, CT Imported by: Carew-Morris Liquor Imports Moonachie, New Jersey Bottled and shipped by: Weinbau Ewald Pfeiffer, GmbH Urzig/Mosel, Germany	1.1 g/liter
38. 1983 St. Margarethener Welschriesling Beerenauslese Sole U.S. Agent: The Great American Wine Co. Bridgeport, CT Imported by: Hoffman Import Co., Inc. Moonachie, New Jersey Bottled and shipped by: Weinbau Ewald Pfeiffer, GmbH Urzig/Mosel, Germany	4.7 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
39. 1981 Rust Neusiedlersee Traminer Trockenbeerenauslese Imported by: The Great American Wine Co., Greenwich, Connecticut Shipped and bottled by: Johann Pfeiffer, Urzig/Mosel, Germany	1.4 g/liter
40. 1982 St. Georgener Spatlese Weissburgunder Sole US Agent: The Great American Wine Co. Bridgeport, CT Imported by: Carew-Morris Liquor Imports Moonachie, New Jersey Bottled and Shipped by: Weinbau Ewald Pfeiffer, Urzig/Mosel, Germany	2.2 g/liter
41. 1982 Falkensteiner Gruner Veltliner Qualitatswein Imported by: Viviano Wine Importers, Inc. Detroit, Michigan Bottled and Shipped by: St. Charles Weinkellerei GmbH, Bernkasel-Kues, Germany	3.3 g/liter
42. 1981 Rust Neusiedlersee Trockenbeerenauslese Imported by: Viviano Wine Importers, Inc Detroit, Michigan Bottled and Shipped by: St.Charles Weinkellerei GmbH, Bernkasel-Kues, Germany	5.4 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
43. 1983 St. Margarethener Beerenauslese Welschriesling Imported by: The Great American Wine Co. Bridgeport, CT Selected by: The Vintage Wine Selections Bottled and Shipped by: Weinbau Ewald Pfeiffer, Urzig/Mosel, Germany	2.26 g/liter
44. 1979 Halbturner Kupferfels Auslese - Eiswein Imported by: Kepp Wine Imports Co. Franklin Park, IL Bottled by: Weingut Haller, Monchhof, Austria Shipped by: Ferdinand Pieroth GmbH, Burg Layen, West Germany	2.81 g/liter
45. 1980 Frauenkirchner Steingang Eiswein Imported by: Pieroth Wine Imports Franklin Park, IL Bottled and Shipped by: Weingut Morhof, St. Margarethin, Austria	.2 g/liter
46. 1979 Retzer Altenberg Gruner Veltliner Serial No. CH-79-001 White Wine Imported by: Wein Bauer Chicago, Illinois Produced by: Wein-Bauer, Stockerau, Austria	1.99 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
47. 1979 Gumpoldskirchner Rotgipfler White Wine Serial No. CH-79-004 Imported by: Wein Bauer Chicago, Illinois Produced by: Wein-Bauer, Stockerau, Austria	2.31 g/liter
48. 1979 Altenberg Riesling White Wine Serial No. CH-79-003 Imported by: Wein Bauer Chicago, Illinois Produced by: Wein-Bauer, Stockerau, Austria	1.82 g/liter
49. 1979 Rot Altenberg Red Light Wine Serial No. CH-79-005 Imported by: Wein Bauer Chicago, Illinois Produced by: Wein-Bauer, Stockerau, Austria	.82 g/liter
50. 1981 Bouvier Trockenbeerenauslese Region Rust-Neusiedlersee Specially Selected By: Victor Viviano Alameda, CA. Bottled and Shipped by: Bruder Grill Weingut Fels-Krems, Austria	19.66 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
51. 1982 Muskat Ottonel Auslese Region Rust-Neusiedlersee Specially Selected By: Victor Viviano Alameda, CA. Bottled and Shipped by: Bruder Grill Weingut Fels-Krems, Austria	.37 g/liter
52. 1982 Gruner Veltliner Spatlese Region Klosterneuberg Specially Selected By: Victor Viviano Alameda, CA. Bottled and Shipped by: Bruder Grill Weingut Fels-Krems, Austria	1.82 g/liter
53. 1982 St. Georgener Spatlese Burgenland - Rust-Neusiedlersee Imported By: John Gross & Co. Baltimore, MD. Bottled in Neumagen-Dhron, and Shipped by Intergena KG, Weinkellerei, Schermbeck/Reinland - West Germany	.78 g/liter
54. 1978 Kirchberger Konigsbutt Gruner-Veltline Eiswein-Beerenauslese Imported By: Pieroth Wine Imports, Inc. Franklin Park, Illinois Bottled By: Ferdinand Pieroth Burg Layen, West Germany	10.4 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (continued)

55.
1976 Edelstaler Trockenbeerenauslese .017 g/liter
Bouvier u. Muskat-Ottonel
White Grape Wine
Imported By:
Pieroth Wine Imports, Inc
Franklin Park, Illinois
Bottled and Shipped By:
Ferdinand Pieroth, Burg Layen
West Germany

56.
Ruster Red .004 g/liter
WPG Rust-Neusiedlersee
Imported By:
Dieter Steinmann Inc.
Glendale, N.Y.
Shipped By:
All Austrian Wines & Spirits, Vienna

57.
Golden Castle 2.4 g/liter
1983 Frauenkirchner Beerenauslese
Burgenland - Rust-Neusiedlersee
Imported By Berani & Co.
Cleveland, OH.
Shipped By:
Gold-Kastell Weinkellereiges, Schermbeck

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GERMAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
1. 1984 Haus of Franz Liebfraumilch Rheinpfalz Qualitatswein A.P. No. 5 907 021 518 84 Imported by: Francis A. Bonanno Inc. Miamisberg, OH. Shipped by: Abfuller Weinkellerei Johann Falkenburg GmbH. Bernkastel-Kues	.1 g/liter
2. 1984 Haus of Franz Liebfraumilch Nahe Qualitatswein A.P. No. 1 907 021 129 84 Imported By: Francis A. Bonanno, Inc. Miamisberg, OH. Shipped By: Abfuller Weinkellerei Johann Falkenberg GMBH Bernkastel - Kues	.1 g/liter
3. 1984 Haus Frickenstein Liebfraumilch Nahe Qualitatswein A.P. No. 1 907 021 29 84 Imported by: Kozak Distributors, Inc. Detroit, MI. Shipped by: C.A. Warren GmbH. & Co. KG., Essen Bottled by: Abfuller Sommerauer Schlosbergkellerei GmbH., Sommerau Abfullort Bernkastel-Kues	.1 g/liter
4. 1982 Wolfsheimer Abtey Kabinett Rheinhessen Qualitatswein A.P. No. 4 907 183 109 84 Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Bottled by: Ferdinand Pieroth GmbH Weinbau-Weinkellerei Burg Layen	.01 g/liter

(page 2) (Updated as of 07/01/86)

GERMAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
5. 1983 Saulheimer Domherr Eiswein Rheinhessen Qualitatswein A.P. No. 4 907 183 108 84 Imported by: Baum Wine Imports, Inc. Franklin Park, Illinois Bottled by: Phillipp und Heinrich Baum Weinkellerei GmbH Bad Kreuznach	.05 g/liter
6. 1979 Westhofener Berkloster Auslese A.P. No. 4 907 183 27 80 Imported by: Pieroth Wine Imports, Inc. Franklin Park, Illinois Bottled By: Ferdinand Pieroth Burg Layen, West Germany	.1 g/liter
7. 1984 Bad Durkheimer Feuerberg Kabinett A.P. No. 5 907 183 66 85 Imported By: Pieroth Wine Imports Co. Franklin Park, Illinois Bottled By: Ferdinand Pieroth GMBH Weinbau-Weinkellerei Burglayen, West Germany	.005 g/liter
8. 1983 Gau-Kongerheimer Vogelsang White Eiswein Grape Rheinhessen, Rulander Qualitatswein met Pradikat Product of Germany Imported By: Pieroth Wine Imports Co. Franklin Park, Illinois Bottled By: Graflich Elzsche Wein - And Sektkellerei Burg Eltz GmBH AP #4 907 183 74 84	.040 g/liter

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GERMAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
9. 1978 St. Martiner Schlos Ludwigshohe White Grape Wine Qualitatswein met Pradikat Beerenauslese Imported By: Pieroth Wine Imports, Inc. Franklin Park, Illinois Bottled and Shipped By: Ferdinand Pieroth, Burg Layen West Germany AP #5 907 183 99 79	.045 g/liter

(page 1) (Updated as of 07/01/86)

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
1. 1981 Barbera D'Asti Imported By: Down East Importing Co. Bedford, N.H. Bottled By: F. Lli Dogliani S.p.A. La Morra, Italy	.03 g/liter
2. 1980 Barbaresco Imported By: Down East Importing Co. Bedford, N.H. Bottled By: F. Lli Dogliani S.p.A. La Morra, Italy	.05 g/liter
3. 1979 Kiola Barola Imported By: Down East Importing Co. Bedford, N.H. Bottled By: FDO S.p.A. La Morra, Italy	.02 g/liter
4. 1973 Gattinara Imported By: Down East Importing Co. Bedford, N.H. Bottled By: F. Lli Dogliani S.p.A. La Morra, Italy	.04 g/liter
5. Lambrusco Imported By: Coral Wine and Spirits Miami, Florida Bottled By: Scabis S.p.A. Caimasino, Italy	.03 g/liter

(page 2) (Updated as of 07/01/86)

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
6. Asti Spumante Imported By: Down East Importing Co. Bedford, N.H. Bottled By: F. Lli Dogliani S.p.A. La Morra, Italy	.04 g/liter
7. 1981 D'Aquino Barbera D'Asti Imported By: D'Aquino Italian Importing Co. Arcadia, California Bottled By: F. Lli Dogliani S.p.A. La Morra, Italy	.03 g/liter
8. 1980 Kiola Barbaresco Imported By: Down East Importing Co. Bedford, N.H. Bottled By: FDO S.p.A. La Morra, Italy	.05 g/liter
9. Riunite Bianco Imported By: Villa Banfi Old Brookville, N.Y. Bottled By: Cantine Coop. Riunite Reggio Emilia	.009 g/liter
10. Riunite Rosato Imported By: Villa Banfi Old Brookville, N.Y. Bottled By: Cantine Coop. Riunite Reggio Emilia	.009 g/liter

(page 3) (Updated as of 07/01/86)

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
11. Riunite Lambrusco dell Emilia Imported By: Villa Banfi Old Brookville, N.Y. Bottled By: Cantine Coop. Riunite Reggio Emilia	.009 g/liter
12. Riunite Spumante Imported By: Villa Banfi Old Brookville, N.Y. Bottled By: Cantine Coop. Riunite Reggio Emilia	.011 g/liter
13. 1979 D'Aquino Barbaresco Imported By: D'Aquino Italian Importing Co. Arcadia, California Bottled By: F. Lli Dogliani S.p.A. La Morra - Piedmont	.01 g/liter
14. 1981 Valenti Barbaresco Imported By: Philip H. Thompson Los Angeles, CA. Bottled By: FDO S.p.A. La Morra, Italy	.01 g/liter
15. 1983 Valenti Barbera d'Alba Imported By: Philip H. Thompson Los Angeles, CA. Bottled By: FDO S.p.A. La Morra, Italy	.01 g/liter
16. 1980 Valenti Barola Imported By: Philip H. Thompson Los Angeles, CA. Bottled By: FDO S.p.A. La Morra, Italy	.01 g/liter

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
17. 1981 Spanna Del Piemonte Imported By: Zenith Imports Corp. Bethpage, NY Bottled By: Azienda Vinicola Castello Di Lozzolo Lozzolo, Italia	.04 g/liter
18. 1973 Valenti Gattinara Imported By: Philip H. Thompson Los Angeles, CA. Bottled By: FDO S.p.A. La Morra, Italy	.05 g/liter
19. 1978 Valenti Barola Riserva Imported By: Philip H. Thompson Los Angeles, CA. Bottled By: FDO S.p.A. La Morra, Italy	.06 g/liter
20. 1984 Contessina Vino da Tavola Vino rosa, Toscana Imported By: Pieroth Wine Imports Co. Franklin Park, Illinois Bottled By: Ferdinand Pieroth Weinbau-Weinkellerei GMBH Burg Layen, West Germany	.019 g/liter

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
21. 1982 la Nebbia bianco della provincia di Sondrio Imported By: Alseca Corporation Washington, DC Bottled By: Imbottigliato dalla Casa Vinicola Enologica Valtellinese s. p. a. Sondrio, Italy	.008 g/liter
22. 1983 Castelvecio SOAVE Classico Denominazione Di Origine Controllata Imported By: Quality Brands, Inc, Glenburnie, Maryland Bottled By: Casa Vinicola V.B.T. S.p.a. Calmasino, Italy	.003 g/liter
23. 1983 Vietti Moscato Del Piemonte mosto d'uva parzialmente fermentato IMB. SES - Castiglione T - R.I 2881/1 CN Imported By: Mayflower Imports, LTD Hyattsville, Maryland Bottled By: Dalle Cantine Vietti Castiglione Falletto	.029 g/liter
24. 1983 Vietti vino da tavola barbera del Pietmonte Imported By: Mayflower Imports, LTD Hyattsville, Maryland Bottled By: Vietti Castiglione Falletto	.008 g/liter

(page 6) (Updated as of 07/01/86)

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
25. 1983 Tenuta Di Pomino DOC White Wine Imported By: Paterno Imports LTD. Chicago, Illinois Bottled BY: Marchesi De Frescobaldi Product of Italy	.011 g/liter
26. 1978 Barra Gattinara Imported By: Consolidated Distilled Products Inc. Chicago, Illinois Estate Bottled By: Guido Barra & Figlio Product of Italy	.003 g/liter
27. 1983 Fattoria Paradiso Vigna dello Spungone Pagadebit White table wine of Bertinoro Imported By: Vinifera Imports LTD Wheaton, Illinois Estate Bottled By: mario Perri	.030 g/liter
28. 1971 Kiola Barolo D.O.C. Imported By: Celarius, Inc. Los Angeles, CA. Bottled By: PDO S.p.A. - La Morra, Italy Product of Italy	.006 g/liter

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
29. 1983 Valenti Dolcetto d'alba DOC Imported By: Philip H. Thompson Los Angeles, CA. Bottled By: FDO S.p.A. - La Morra, Italy Product of Italy	.020 g/liter
30. 1984 Valenti Chardonnay Langhe, Piedmont Imported By: Celarius, Inc. Los Angeles, CA. Bottled By: FDO S.p.A. Product of Italy	.018 g/liter
31. Bongiorno Lambrusco Italian Mellow Red Table Wine Imported By: Wine Merchants of Syracuse, Ltd. Liverpool, N.Y. Produced and Bottled By: Vinicola Correggese Correggio - Italy Code Number RI 813/RE	.002 g/liter

EXHIBIT "2"

WINE PRODUCTION STANDARDS FOR JAPAN

[Because of space limitations/cost constraints and because of minimal relevance to issues covered in hearing, the material in this exhibit has been omitted but is available for review in subcommittee files.]

EXHIBIT "3"

WINE PRODUCTION STANDARDS FOR EEC

[Because of space limitations/cost constraints and because of minimal relevance to issues covered in hearing, the material in this exhibit has been omitted but is available for review in subcommittee files.]

EXHIBIT "4"

BATF COMPUTER LIST OF CERTIFICATES OF LABEL APPROVAL FOR AUSTRIAN WINES

KEY

VEND= Unique Vendor Code Assigned to an Industry Member

C/T CODE= Class and Type Code
(8064= Red and Rose' Austrian Wines)
(8164= White Austrian Wines)

PLANT OR PERMIT NBR= Unique Number Assigned to an Industry Member; In this instance the FAA Importer Basic Permit Number

CERTIFICATES OF LABEL APPROVAL
C/T CODE 8064 - Red and Rose' Austrian Wines

DATE PREPARED: 19 JUN 86

BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
CERTIFICATE OF LABEL APPROVAL (COLA) SYSTEM

BRAND NAME	VEND	C/T CODE	CLASS/TYPE (C/T) DESCRIPTION	DOCUMENT SERIAL NBR	CANCEL OR TEMP DATE	DATE OF APPROVAL	FORM	PLANT OR PERMIT NBR	APPLICANT SERIAL NBR
KLOSTERKELLER SIEGENDORF	C965	8064	AUSTRIAN P NR	79-07-2085	00 00 00	79-07-24		NY I 575	
WINZERHOF PAUL	C516	8064	RUSTER RESERVE	79-08-1954		79-08-31		Z I 335	
WINZERHOF PAUL	4516	8064	NEUSIEDLER	79-08-1955	179-11-01	79-08-01		Z I 305	
CHATEAU DE MAICHAC	8508	8064	BORDEAUX	79-08-3697		79-08-31		NY I 345	
RUSTER BURGUNDER	1882	8064	RED TBL WINE	79-08-2196		79-08-13		VA I 298	
MORANDELL	5508	8064	STEINER HUND	79-08-3701		79-08-28		NY I 345	
MORANDELL	8508	8064	RUSTER BEERASLE	79-08-3704		79-08-28		NY I 345	
MORANDELL	4508	8064	RUSTER SPAT	79-08-3695		79-08-28		NY I 345	
MORANDELL	8508	8064	K SANDGRUBE	79-08-3699		79-08-28		NY I 345	
MORANDELL	4504	8064	FALKENSTEINER	79-08-3698		79-08-28		NY I 345	
MORANDELL	8503	8064	RUSTER ROTHUGEL	79-08-3696		79-08-28		NY I 345	
MORANDELL	8508	8064	RUSTER AUSLESE	79-08-3700		79-08-28		NY I 345	
MORANDELL	8508	8064	K TROCKENBEEREN	79-08-3703		79-08-28		NY I 345	
MORANDELL	4508	8064	RUSTER SPAT	79-08-3702		79-08-28		NY I 345	
MORANDELL	8508	8064	GUMPOLDSKIRCHNE	79-08-3705		79-09-28		NY I 345	
POMMERY	8508	8064	CHAMPAGNE	79-08-3706		79-08-28		I 345	
ZENTRALKELLEREI	3354	8064	BLAUFRANKISCH	79-08-1677		79-08-31		TX I 426	
GUMPOLDSKIRCHNER	7328	8064	OSTERREICH 77	79-09-1975		79-09-19		IL I 185	
GUMPOLDSKIRCHNER	7028	8064	ROTGIPFLER	79-09-1974		79-09-19		IL I 185	
GUMPOLDS KIRCHNER	2028	8064	SPAT ROTGIPSSLE	79-10-2055		79-10-02		I 185	
OSTERREICH	3383	8064	KREMSER KISE	79-10-2359		79-10-22		CHI I 257	
RUSTER BLAUFRANKISH	1360	8064	RED TBL WINE	79-10-2361		79-10-22		CHI I 257	
RUSTER BLAUFRANKISH	3080	8064	RED TBL WINE	79-10-2360		79-10-29		CHI I 257	
MORANDELL RUSTER ROTHUGEL	8508	8064	BLAUFRANKISCH	79-11-3550		79-11-05		NY I 345	
MORANDELL RUSTER SPATLESE	4508	8064	BLAUFRANKISCH	79-11-3549		79-11-05		NY I 345	
MATZNER DORNER	4663	8064	KAB 1978	79-11-2836		79-11-07		MN I 321	
AUSTRIAN PINOT NOIR	4660	8064	SPAT	79-11-2837	180-02-08	79-11-09		MN I 321	
BLAUFRANKISCH	3966	8064	RED WINE	79-11-2243		79-11-29		NY I 575	
KREMSER ST LAURENT	3383	8064	1976	79-12-1693		79-12-12		CHI I 257	
RUSTER SPATLESE	4508	8064	BLAUFRANKISCH	79-12-2500		79-12-18		NY I 345	
RUSTER ROTHUGEL	8550	8064	BLAUFRANKISCH	79-12-2501		79-12-18		NY I 345	
MALTESER	8112	8064	1978	80-01-1815		80-01-02		NY I 35	
AUSTRALN PINOT NOIR	3354	8064	RED	80-01-1155		80-01-29		TX I 426	
AUSTRIAN PINOT NOIR	3354	8064	RED	80-01-1156		80-01-29		TX I 426	
BLAUFRANKISCH	3354	8064	RED	80-01-1157		80-01-28		TX I 426	
ANDAUER KAISERGARTEN	7135	8064	SPAT 1979	80-02-2523		80-02-06		ILL I 446	
ANDAUER KAISERGARTEN	7135	8064	SPAT 1979	80-03-2536		80-03-11		ILL I 446	
GUMPOLDSTIRCHER	0218	8064	ROTWEIN	80-04-2155		80-04-01		TX I 249	
AUSTRIAN CELLAR WINE	3533	8064	BLAUFRANKISCH	80-04-2189		80-04-30		FL I 635	
AUSTRIAN CELLAR WINE	3530	8064	ST LAURENT	80-04-2170		80-04-30		FL I 635	
KREMSER ST LAURENT	4598	8064	1978	80-04-2908		80-04-21		ILL I 415	
GUMPOLDSKIRCHEN	3719	8064	ROTWEIN 1976	80-05-1874		80-05-06		TX I 249	
SCHLOSSWEIN	0366	8064	PINOT NOIR	80-05-1887		80-05-16		NY I 575	
KREMSER ST LAURENT	3383	8064	1976	80-05-1875		80-05-28		TX I 249	
BLAUFRANKISCH ST LAURENT	3622	8064	EST NPSORN SEI	80-06-2914		80-06-16		ILL I 415	
OSTERREICH RUSTER ROTHUGEL	3622	8064	SPATLESE	80-06-2915		80-06-16		ILL I 415	
KLOSTERKELLER SIEGENDORF SCHLO	1232	8064	RD TBLE 1977	80-06-2592		80-06-26		9 I 294	
KLOSTERKELLER SIEGENDORF	3356	8064	RTW	80-07-2930		80-07-21		J I 327	
KIRCHZENTRUM	4671	8064	AUS RD	80-07-4382		80-07-21		CHI I 199	
RUTER STORCH	4671	8064	1977 RED WINE	80-08-3210		80-08-31		CHI I 199	
KLOSTERBERG	6324	8064	1978 KLOSTERGAR	80-08-2528	181-03-16	80-09-04		NY I 1403	
PIEROTH	7135	8064	1977 RED WINE	80-08-2783		80-09-12		ILL I 446	
KREMSER OST WINZER	4733	8064	1978 RED WINE	80-08-2362		80-09-21		C O I 234	
KREMSER ST LAURENT	4733	8064	1978 OSTER [illegible]	80-08-2363		80-09-21		CC I 234	
1978 SEIBIGHT RUSTER BLAUFR	4733	8064	AUSTRIAN [illegible]	80-09-3117		80-09-19		COLO I 234	

DATE PREPARED: 09 JUN 86

BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS
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BLAUFRANKISCH	9779	8C64	AUSTRIAN TABLE	80-09-4194		80-09-23		MC I 234	
TROCKENBEERENAUSLESE	9779	8C64	AUSTRIAN TBL WN	80-09-4230		80-09-23		MD 1324	
AUSTRIAN CELLAR WINES	0433	8064	RED WN	80-10-1932		80-10-29		FL I 635	
ST. LAURENT	0430	8C64	RED WINE 1970	80-10-1931		80-10-20		FL I 635	
BENEDICTINE	1882	8064	RED WN	80-10-2290		80-10-22		VA I 290	
HAUGSDORFER BLAUFRANKISCH	3642	8C64	1979 RD WNE	80-11-3459		80-11-23		MASS I 141	
OGGAUER PINOT BLEU	3642	8064	1979 RD WNE	80-11-3458		80-11-03		MASS I 141	
KAISER ROSE?	9825	8064	BLAUER PORTUGIESER	80-12-2854		80-12-01		MI-I-436	3507
STADTSIEGEL	9825	8C64	BLAUER BURGUNDER	80-12-2853		80-12-01		MI-I-436	3508
SCHLOSSADLER	0363	8064	RED GARPE WINE 1979	81-01-1691		81-01-19		CA-I-1001	JH-81-1
HAUGSDORFER FASAN RO F	1627	8064	WEINBAU JOSEF LUST	81-01-1967		81-01-26		CA-I-899	390
ALL AUSTRIAN WINES & SPRIRITS	8600	8064	RUSTER RED TABLE WINE	81-01-2820		81-01-28		NY-I-449	163
ALTER SUNDER BRUDER (WILL	1627	8C64	SELECTED AUSTRIAN WINE	81-02-2024		81-02-02		CA-I-898	386
WEINGUT KEANHF	7731	8064	ST LAURENT	81-02-2867		81-02-03		CA-I-1556	A411
ROT ALTENBERG	9627	8064	RED LIGHT WINE	81-02-3297		81-02-12		IL-I-596	CH-79-005
KLOSTERKELLER SIEGENDORF	7364	8064	RED WINE	81-02-2902		81-02-19		MD-I-242	1724
KLOSTERKELLER SIEGENDORF	7364	8064	RED WINE	81-02-2903		81-02-27		MC-I-242	1720
KLOSTERKELLER SIEGENDORF	7364	8064	RED WINE	81-02-2904		81-02-27		MD-I-242	1721
ST SAURENT	8600	8C64	RED QUALITY WINE	81-03-3530		81-03-02		NY-I-449	172
KLOSTERKELLER SIEGENDORF	2421	8C64	AUSTRIAN PINOT NOIR	81-03-2270	T81-05-06	81-03-25		NJ-I-412	0015
KLOSTERKELLER SIEGENDORF	6219	8064	RED TABLE WINE	81-03-2890		81-03-05		MASS-I-122	22501
KLOSTERKELLER SIEGENDORF	6234	8064	RED TABLE WINE	81-03-2891		81-03-05		MASS-I-122	22101
KLOSTERKELLER SIEGENDORF	6234	8064	RED TABLE WINE	81-03-2889		81-03-25		MASS-I-122	22401
JAKOB GERHARDT	3622	8064	1979 RED STILL WINE	81-03-2388		81-03-30		ILL-I-419	G41
BLAUFRANKISCH	1856	8C64	RED WINE	81-04-2520		81-04-30		U-I-327	H-771-6
SCHLOSS WILFERSDORF	1746	8J64	RED WINE	81-04-2078		81-04-27		PA-I-137	35-93
PRINZ VON LEISSER	5729	8C64	AUSTRIAN DRY ROSE TABLE WINE	81-05-3066		81-05-06		TX-I-462	5
PRINZ VON LEISSER	5729	8064	AUSTRIAN DRY RED TABLE WINE	81-05-3067		81-05-06		TX-I-462	9
SCHLOSS WILFERSDORF	1237	8064	RED WINE TABLE	81-05-1769		81-05-12		WIS-I-205	48136
KLOSTERKELLER SIEGENDORF	3446	8C64	AUSTRIAN PINOT NOIR 1970	81-05-3932		81-05-15		WA-I-889	139
PRINZ VON LEISSER	5729	8064	AUSTRIAN DRY RED TABLE WINE	81-05-3064		81-05-18		TX-I-462	14
PRINZ VON LEISSER	5729	8064	AUSTRIAN DRY ROSE TABLE WINE	81-05-3065		81-05-18		TX-I-462	17
ALLOSTICAL	7621	8C64	RED TABLE WINE 1979	81-05-2208		81-05-20		GA-I-391	08114
BRUDER GOTTL	7621	8C64	RED TABLE WINE 1979	81-05-2210		81-05-20		GA-I-391	08111
BURGENLANDER	7621	8064	RED TABLE WINE 1979	81-05-2209		81-05-20		GA-I-391	09112
SCHLOSS GRAFENEGG	9609	8064	STRASSER AUSLESE WHITE WN 1977	81-06-4261		81-06-03		SF-I-654	S-317 PU1206
RUSTER BLAUFRANKISCH	5701	8C64	RED TABLE WINE	81-06-3051		81-06-10		CHI-I-60	1012
STADTSIEGEL	0630	8064	BLAUER BURGUNDER RED WINE	81-06-1637		81-06-11		FL-I-639	3277
WINZERGENOSSENSCHAFT KREM	4680	8064	KREMSER ROTWEIN RED AUSTR WINE	81-06-3937		81-06-24		NY-I-449	201
STIFTSKELLERAMT GOTTWEIG	4980	8C64	RIESLING-SYLVANER WHT WN 1980	81-06-2832A		81-06-27		MD-I-319	RD-108
LEONARD KREUSCH	4756	8C64	USBERGEN RUBIN RED TBLS WINE	81-07-2681		81-07-27		W-I-133	A026
KREMSER RATSHERR	4558	8J64	HENNESSEY RED STILL WINE	81-07-2617		81-07-28		ILL-I-419	A311
JAKOB GERHARDT	1782	8064	RUST NEUSIEDLER SEE RED WINE	81-09-1864	T81-12-01	81-09-02		FL-I-913	GW-06
JAKOB GERHARDT	1782	8C64	OESTERREICH RED STILL WINE	81-09-1867		81-09-02		FL-I-913	GW-12
JAKOB GERHARDT	1782	8C64	OESTERREICH RED STILL WINE	81-09-1868	T81-09-02	81-09-02		FL-I-913	GW-15
JAKOB GERHARDT	1782	8C64	OSTERREICH RED STILL WINE	81-09-1865		81-09-02		FL-I-913	GW-05
JAKOB GERHARDT	3622	8064	RED STILL WINE OESTERREICH	81-09-2117		81-09-03		III-I-419	G-93
JAKOB GERHARDT	3622	8064	RED STILL WINE OESTERREICH	81-09-2118		81-09-03		III-I-419	G-92
KLOSTERKELLER SIEGENDORF	0615	8C64	AUSTRIAN PINOT NOIR RED WINE	81-09-1569		81-09-29		FL-I-572	BGI-973-65
RUTER STORCH	1743	8C64	AUSTRIA WINE	81-10-1317		81-10-02		ID-I-351	846
STIFTSKELLERAMT GOTTWEIG	4983	8C64	BENEDICTINE DRY RED WINE	81-10-2717		81-10-16		MC-I-315	RD-113
KLOSTERKELLER SIEGENDORF	1856	8C64	BLAUFRANKISCH RED WINE	81-11-2121		81-11-05		U-I-327	H-876-6
JAKOB GERHARDT	3622	8064	RED STILL WINE	81-11-2033		81-11-16		III-I-415	G62
SCHLOSS WILFERSDORF	6933	8J64	1979 ZWEIGELT RED WINE	81-11-2355		81-11-16		CC-I-234	130-81
BURGENLANDISCHER WINZERVER. KAR	5554	8C64	RUTER STORCH RED WINE	81-12-2133		81-12-14		ILL-I-415	R031

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BURGENLANDISCHER WINZ VERBAND	4590	8064	NEUSIEDLER SEEKONIG RED WINE	01-12-2138		01-12-14	ILL-1-415	8004
NIEDEROSTERREICHISCHE WEINZERV	6022	8064	RED TABLE WINE	01-12-2353		01-12-14	CA-1-1725	676C
KLOSTERKELLER SIEGENDORF	5646	8064	BL BURGUNDER SPATLES	01-12-2942		01-12-14	VT-1-123	WA-1-009
WEINE AUS LASBERG	9419	8064	MERLOT QUALITY WINE	02-01-2111		02-01-13	VT-1-123	82003
OSTERREICH	7615	8064	KREMSER ROSE' WINE	02-01-1377		02-01-21	FL-1-572	BG-1-573-51
OSTERREICH	7615	8C64	KREMSER ALTWEIN RED QUALITY WN	02-01-1076		02-01-21	FL-1-572	BGI-573-50
T.E. CHARMOTTE	7660	8C64	CHATEAU MONTROSE	02-01-1078		02-01-21	DOS-1-27	027
KLOSTERKELLER SIEGENDORF	1932	8064	SCHLOSSWEIN RED WINE 1979	02-01-1101		02-01-22	9-1-254	82-3
KLOSTERKELLER SIEGENDORF	1932	8C64	AUSTRIAN PINOT NOIR RED WINE	02-01-1102		02-01-22	9-1-254	82-9
KLOSTERKELLER SIEGENDORF	7364	8064	SCHLOSSWEIN KABINETT	02-01-1704		02-01-25	MO-1-242	1783
KLOSTERKELLER SIEGENDORF	7364	8C64	SCHLOSSWEIN REC WINE	02-01-1702		02-01-25	MO-1-242	1781
KLOSTERKELLER SIEGENDORF	7364	8C64	AUSTRIAN PINOT NOIR RED WINE	02-01-1703		02-01-25	MO-1-242	1777
KLOSTERKELLER SIEGENDORF	C056	8C64	AUSTRIAN PINOT NOIR	02-01-0907		02-01-27	TX-1-426	5033
BLAUFRANKISCH	4217	8C64	RED TABLE WINE	02-01-1456		02-01-28	FL-1-716	82-004
ROSE CHAPTINE	4217	8064	ROSE TABLE WINE	02-01-1457		02-01-28	FL-1-716	82-003
ST MARTINUS	6430	8C64	RED QUALITY WINE	02-03-1770		02-03-08	FL-1-635	4577
A ROBERT HAAS SELECTION	9419	8064	RED TABLE WINE	02-03-4015		02-03-09	VT-1-123	82002
A ROBERT HAAS SELECTION	9419	8064	RED TABLE WINE	02-03-4016		02-03-09	VT-1-123	82001
SCHLOSSADLER	8123	8064	MONCHHOFER WEISSHERBST 1980	02-03-3606		02-03-11	CA-1-2282	14
KLOSTERGARTEN	6430	8C64	RFG QUALITY WINE	02-03-1772		02-03-12	FL-1-635	5777
KAISER ROSE	6430	8064	ROSE WINE	02-03-1769		02-03-15	FL-1-635	4477
FASAN ROSE	6433	8064	ROSE TABLE WINE	02-03-1773		02-03-25	FL-1-635	6277
ROSE	6430	8064	ROSE QUALITY WINE	02-03-1771		02-03-25	FL-1-635	4677
SCHLOSS WILFERSDORF	4933	8064	RED WINE 1979	02-04-2863		02-04-16	CC-1-234	22-02
BURGENLAND	2494	8C64	RUSTER ST LAURENT RED WINE	02-04-2193		02-04-20	NY-1-531	0284
ST. MARGARETHENER WETMINGER	1707	8C64	RED STILL AUSLESE WINE	02-05-1821		02-05-05	FL-1-513	AW-91
KREMSER	7418	8C64	PINOT BLANC WHITE WINE	02-05-2076		02-05-17	TX-1-453	FLA-354-82
KREMSER ROSE	7418	8C64	RED QUALITY WINE	02-05-2077		02-05-17	TX-1-453	FLA-355-82
KLOSTERKELLER SIEGENDORF	6234	8064	KLOSTERVLIN ROSE KABINETT	02-05-2502		02-05-27	MA-1-122	52102
KLOSTERKELLER SIEGENDORF	6234	8C64	KLOSTERVLIN ROSE KABINETT	02-05-2501		02-05-27	MA-1-122	92002
LE JARDINET CUVEE BLANC DE BLANC	7418	8064	DRY FRENCH WHITE TABLE WINE	02-06-3794		02-06-02	PH-P3247	05-24-82-02
GUMPOLDSKIRCHEN	7418	8C64	1976 GUMPOLDSKIRCHNER RED WINE	02-06-3793		02-06-15	TX-1-453	FLA-373-82
GOLDENER STORCH	5779	8C64	AUSTRIAN WHITE TBLS WINE	02-06-4494		02-06-28	MC-1-324	62202-3
ST LAURENT OSTERREICH	3627	8C64	AUSTRIAN RED WINE 1980	02-07-1741		02-07-24	IL-1-620	893
WINZER VERBAND	5779	8C64	ROSE STORCH TBLS WINE	02-07-2972		02-07-29	MC-1-324	62202-5
TATTENDORFER ST. LAURENT AUSST	0439	8064	RED WINE 1981	02-08-1739		02-08-16	FL-1-635	9977
OSTERREICH	4790	8C64	BLAUFRANKISCH	02-08-2900		02-08-30	NM-1-121	103
OSTERREICH	4790	8064	ST. LAURENT	02-08-2899		02-08-31	NM-1-121	194
JAKOB GERHARDT	3627	8C64	OSTERREICH RED STILL WINE	02-09-2649		02-09-07	ILL-1-415	G-76
SCHLOSSADLER	8123	8064	RED GRAPE WINE	02-09-3642		02-09-14	CA-1-2202	15
JACOB GERHARDT	1707	8064	RED STILL WINE	02-09-2313		02-09-15	FL-1-513	GW-09
JOHANN KELLER	4660	8064	ST. LAURENT AUSTRIAN RED WINE	02-10-2732		02-10-13	WI-1-321	92982-2
KLOSTERKELLER SIEGENDORF	1932	8064	AUSTRIAN PINOT NOIR KABINETT	02-10-2036		02-10-22	9-1-254	82-206
JAKOB GERHARDT	3622	8C64	GERMAN RED STILL WINE	02-10-2263		02-10-29	ILL-1-415	G 80
KLOSTERKELLER SIEGENDORF	9433	8064	AUSTRIAN PINOT NOIR RED WINE	02-11-4600		02-11-12	LA-1-225	1510
SCHLOSS GRAFFENEGG	1237	8C64	AUSTRIAN PINOT NOIR 79	02-11-1943		02-11-17	WIS-1-205	10622
WINZERGENOSSENSCHAFT	1627	8C64	AUSTRIAN RED QUALITY WINE	02-11-2071		02-11-22	CA-1-899	505
WINZERVERBAND	6022	8064	KAISER ROSE AUSTRALIAN ROSE	02-11-3235		02-11-30	CA-1-1725	MD 103
RUSTER	0213	8064	AUSTRIAN GRAPE RED WINE	02-12-1196		02-12-01	TX-1-749	1-2146
WINZERVERBAND KIRCHBERG-WAGRAM	6022	8064	KAISER ROSE TABLE WINE	02-12-2136		02-12-06	CA-1-1725	MD 106
ALL AUSTRIAN WINES & SPIRITS	8680	8C64	RUSTER RED	02-12-2715		02-12-30	NY-1-449	259
KREMSER ST. LAURENT	9316	8064	AUSTRIAN REG WINE 1981	03-02-1724		03-02-10	CC-1-263	0-8
ALL AUSTRIAN WINES & SPIRITS	8680	8C64	RUSTER RED WINE	03-03-3786		03-03-08	NY-1-449	265
PIERROTH	7135	8C64	AUSTRIAN ROSE GRAPE WINE	03-03-3436		03-03-11	ILL-1-446	PI A 9525
PIERROTH	7135	8C64	AUSTRIAN ROSE GRAPE WINE	03-03-3407		03-03-11	ILL-1-446	PI A 95260

DATE PREPARED [illegible]

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[illegible]	1135 BC64 AUSTRIAN ROSE GRAPE WINE	83-03-3439		83-03-11		ILL-I-446	PI A 3526A
[illegible]	1135 BC64 AUSTRIAN ROSE GRAPE WINE	83-03-3435	T83-06-14	83-03-14		ILL-I-446	PI A 3526C
[illegible]	1135 BC64 AUSTRIAN ROSE GRAPE WINE	83-03-3430		83-03-21		ILL-I-446	PI A 3526D
[illegible]	1265 BC64 VARGU'S RED TABLE WINE	83-03-3703		83-03-22		TX-I-530	A-315-9312
[illegible]	1135 BC64 BEERENAUSLESE ROSE GRAPE WINE	83-04-3329		83-04-15		ILL-I-446	PI-A-3528
[illegible]	1296 BC64 KREMSER ST LAURENT	83-04-3580		83-04-15		TX-I-530	A-318-8321
[illegible]	0966 BC64 DRY RED WINE	83-04-2078		83-04-12		NY-I-575	KS
KLOSTERKELLER SIEGENDORF	0394 BC64 RED WINE	83-05-2392		83-05-04		TX-I-426	8257
PRIVATE RESERVE BLAUFRANKISCH	0096 BC64 RED WINE	83-05-2091		83-05-13		TX-I-426	8278
PRIVATE RESERVE BLAUFRANKISCH	5056 BC64 AUSTRIAN RED TABLE WINE	83-05-3209		83-05-16		U-I-327	H-1113-6
KLOSTERKELLER SIEGENDORF	1366 BC64 PINOT NOIR BLAUER BURGUNDER	83-05-4063		83-05-27		GA-I-296	AU 001
SCHLOSS GRAFENEGG	6366 BC64 ZWEIGELT 1981 RED TABLE WINE	83-05-4064		83-05-27		GA-I-296	AU 002
SCHLOSS GRAFENEGG	6366 BC64 ZWEIGELT RED TABLE WINE	83-05-4062		83-05-27		GA-I-296	AU 014
SCHLOSS [illegible]	1767 BC64 ST. MARGARETHENER BLAUBURGER	83-06-2155		83-06-01		FL-I-752	GW-33
JACOB GERHARDT	5627 BC64 S. MARGARETHNER WHT WINE	83-06-2583		83-06-10		ILL-I-415	G 88
JACOB GERHARDT	9779 BC64 AUSTRIAN RED TABLE WINE	83-06-5004		83-06-10		MC-I-324	6183-8
[illegible]	9779 BC64 AUSTRIAN RED TABLE WINE	83-06-5005		83-06-24		MC-I-324	6183-9
KAISER	5637 BC64 AUSTRIAN RED WINE	83-06-2984		83-06-28		CHI-I-80	1028
[illegible]	6236 BC64 PRIVATE RESERVE RED DRY WINE	83-07-3595	T83-10-08	83-07-11		MASS-I-122	5383
KLOSTERKELLER SIEGENDORF	7229 BC64 RUSTER BLAUFRANKISCH RED	83-07-3934		83-07-13		CA-I-2441	BK 15
RED STORK	7839 BC64 AUSTRIAN RED WINE	83-08-3608		83-08-04		CA-I-2041	1983-34
SCHLOSS [illegible]	5535 BC64 AUSTRIAN 1979 RED WINE	83-08-3109		83-08-11		IL-I-660	14N00675
SCHLOSS [illegible]	4319 BC64 SPATLESE	83-08-2582		83-08-22		VA-I-360	4724
[illegible]	4319 BC64 STILL TABLE WINE	83-08-2584		83-08-22		VA-I-360	4720
ROTER HUSAR BLAUFRANKISCH	4319 BC64 SPATLESE	83-08-2583		83-08-22		VA-I-360	4721
ROTER HUSAR BLAUFRANKISCH	5916 BC64 AUSTRIAN RED WINE	83-08-4487		83-08-24		CO-I-263	OR-1
RUSTER RED	7729 BC64 SPATLES	83-08-3675		83-08-26		CA-I-2241	BK 16
RUSTER BLAUFRANKISCH	5535 BC64 HOLYSTONE BLAUBURGUNDER	83-10-3407		83-10-04		IL-I-660	19N00475
SCHLOSS GOBELSBURG	5939 BC64 HOLYSTONE ROSE 1982	83-10-3438		83-10-04		IL-I-660	19N00575
SCHLOSS GOBELSBURG	8811 BC64 ROSE TABLE WINE 1982	83-10-1846		83-10-06		WA-I-890	AUS 107 W
KAISER ROSE	8811 BC64 RED TABLE WINE 197	83-10-1845		83-10-06		WA-I-890	AUS 108 W
ST. LAURENT	4776 BC64 ROSE DRY 1982	83-11-2753		83-11-04		FL-I-730	13
AUSTRIAN SUMMIT	4776 BC64 BLAUFRANKISCH DRY 1982	83-11-2754		83-11-04		FL-I-730	12
AUSTRIAN SUMMIT	1557 BC64 BLAUFRANKISCH 1981	83-11-2015U	T84-02-15	83-11-15		PHI-I-53	AU-09-83
[illegible]	1957 BC64 RED TABLE	83-11-3132	T84-02-19	83-11-15		PHI-I-53	AU-09-83
[illegible] BLAUFRANKISCH	7229 BC64 CABERNET-MERLOT 1979	83-11-3932		83-11-22		CA-I-2241	BW19
R. SCHLUMBERGER VOSLAU	7229 BC64 RED WINE 979	83-11-3931		83-11-22		CA-I-2241	BW18
VOSLAUER GOLDECK CABINET	1557 BC64 RED TABLE SPAT	83-11-3133		83-11-30		PHI-I-53	AU-07-83
[illegible] BLAUFRANKISCH	1557 BC64 BLAUFRANKISCH SPATLESE	83-11-2015V		83-11-30		PHI-I-53	AU-07-83
[illegible]	5539 BC64 SANKT LAURENT 1982	83-12-2465		83-12-21		IL-I-663	12WC0475
[illegible] NOIR	5535 BC64 HOLYSTONE BLAUBURGUNDER 1976	83-12-2463		83-12-29		IL-I-660	15N00475
SCHLOSS GOBELSBURG	5539 BC64 HOLYSTONE ROSE 1982	83-12-2464		83-12-29		IL-I-660	15N00575
SCHLOSS GOBELSBURG	1379 BC64 WINZERWEIN 1982 BLAUFRANKISCH	84-01-1451		84-01-04		TX-I-555	4782
ST. MARTINUS	0219 BC64 RED TABLE WINE	84-01-1240		84-01-05		TEX-I-249	1-2336
VOSLAUER GOLDECK CABINET	1379 BC64 WINZERWEIN 1982 BLAUFRANKISCH	84-01-1450	T84-06-23	84-01-24		TX-I-555	47821
VARGU'S	[illegible] BC64 PINOT NOIR 1981	84-01-1449		84-01-25		TX-I-555	8011
[illegible]	4935 BC64 VIN ROSE	84-02-2963		84-02-06		GA-I-425	003
LENZ MOSER	[illegible] BC64 VIN ROUGE	84-02-2964		84-02-06		GA-I-425	002
LENZ MOSER	1240 BC64 AUSTRIAN PINOT NOIR	84-02-2068		84-02-09		CA-I-1979	750
CHATEAU VIENNA	1734 BC64 RED TABLE WINE	84-02-3213		84-02-16		MASS-I-122	2884
PINOT NOIR	0219 BC64 RED TABLE WINE 1982	84-02-1799		84-02-27		TEX-I-249	1-2346
GUMPOLDSKIRCHNER	9751 BC64 PINOT NOIR-BLAUBURGUNDER 1982	84-02-4209		84-02-27		VT-I-126	0336
TRAPP FAMILY LODGE	9751 BC64 ROSE OF AUSTRIAN PINOT NOIR	84-02-4210		84-02-27		VT-I-126	0339
TRAPP FAMILY LODGE	0054 BC64 SPATLESE	84-03-1675		84-03-07		TX-I-426	8730
AUSTRIAN PINOT NOIR	0394 BC64 RED WINE	84-03-1677		84-03-22		TX-I-426	8734
AUSTRIAN PINOT NOIR							

DATE PREPARED: 07 JAN 85

BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS
CERTIFICATE OF LABEL APPROVAL (COLA) SYSTEM

BRAND NAME	YEAR	C/T CODE	CLASS/TYPE (C/T) DESCRIPTION	DOCUMENT SERIAL NBR	CANCEL OR TEMP DATE	DATE OF APPROVAL FORM	PLANT OR PERMIT NBR	APPLICANT SERIAL NBR
PRIVATE RESERVE	0356	8C24	DRY RED WINE	84-03-1676		84-03-06	TX-I-426	8729
BURGENLANDISCHER WINZER VERBAN	0140	8024	RED STORK RUSTER BLAUFRAENKISC	84-03-1822		84-03-06	NM-I-121	109
BURGENLANDISCHER WINZER VERBAN	0140	8024	RUSTER SPATLESE BLAUFRANKISCH	84-03-1821	T84-04-01	84-03-07	NM-I-121	114
EISENSTADTER RUTMINGER SPATLESE	7135	8024	OSTERREICH 1982	84-03-4305		84-03-14	ILL-I-446	WO A 3395
EISENSTADTER RUTMINGER SPATLESE	7135	8C24	RED GRAPE WINE	84-03-4084		84-03-22	ILL-I-446	WO A 0055A
AUSTRIAN	9622	8C44	LIGHT RED WINE	84-03-5496		84-03-27	IL-I-596	CH-84-303
SCHLOSS-RAUFF	9622	8084	PINOT NOIR	84-03-5497		84-03-27	IL-I-596	CH-84-010
SCHLOSS-RAUFF	9622	8024	ST. LAURENT RED KABINETT	84-03-5498		84-03-27	IL-I-596	CH-84-011
SCHLOSS-RAUFF	9622	8C24	ROSE WINE	84-03-5495		84-03-27	IL-I-596	CH-84-009
ILLMITZER FELSENECKER [illegible]	7135	8C24	1983 ROSE GRAPE WINE	84-04-5422		84-04-11	IL-I-446	PI-A-9594
KLOSTERKELLER SIEGENDORF	0966	8024	PINOT NOIR KABINETT RED WINE	84-04-2791		84-04-17	NY-I-575	KS-11
GOLD MEDAL KAIZER-STIFT BRAND	6924	8024	ROSE WINE	84-04-5344		84-04-19	NY-I-415	314C
KAIZER-STIFT BRAND	6924	8044	1982 BAROSSA VALLEY SHIRAZ	84-04-5345		84-04-19	NY-I-415	674
KAIZER-STIFT BRAND	6924	8024	1981 CABERNET SAUVIGNON	84-04-5346		84-04-20	NY-I-415	293-B
BURGENLAND PINOT NOIR	7364	8024	SPATLESE RED WINE	84-04-5406		84-04-20	MD-I-242	1842
SCHLOSSWEIN KABINETT	7364	8C24	DRY RED WINE	84-04-5407		84-04-20	MD-I-242	1841
RUSTER MONCH	1760	8024	BLAUFRANKISCH RED WINE	84-04-2873		84-04-24	CA-I-1979	726
ST GEORGE BLAUFRANKISCH	7427	8044	RED TABLE WINE	84-05-4580		84-05-07	IL-I-678	020
TATTENDORFER ST. LAURENT AUSST	1672	8C24	RED WINE 1982	84-05-3033		84-05-18	IL-I-620	1264
OSBERGER ROSE KABINETT	8164	8024	1981 ROSE WINE	84-05-4854		84-05-23	IL-I-552	19085
VIENNA PINOT NOIR	7427	8C24	RED TABLE WINE	84-05-4507		84-05-30	IL-I-678	029
GOTTWEIG	6661	8024	1983 PINOT NOIR KREMS	84-06-4839		84-06-19	MD-I-334	UMBC-004-84
SCHLOSS RIEGERSBURG	4933	8024	1982 BLAUER BURGUNDER PIN NOIR	84-06-4051		84-06-27	CC-I-234	102-84
SCHWEGMANN	5507	8024	BLAUFRANKISCH 1982	84-06-4404	T84-09-29	84-06-27	LA-I-296	019
RUSTER MONCH	0694	8024	RED WINE	84-07-1555		84-07-16	CA-P-4440	BAB-2
RUSTER SPATLESE	0694	8024	RED WINE	84-07-1556		84-07-16	CA-P-4440	BAB-4
BLAUFRANKISCH SPATLESE	0615	8064	RED TABLE WINE	84-07-1551		84-07-23	FL-I-572	BGI-573-97
PINOT NOIR	0219	8C64	RED TABLE WINE	84-07-1411		84-07-24	TX-I-249	1-2449
ROSE	0219	8C64	ROSE TABLE WINE	84-07-1412		84-07-24	TX-I-249	1-2450
BLAUFRANKISCH	1932	8024	RED TABLE WINE	84-08-2042		84-08-06	9-I-254	84-161
TUSSNITZBERGER DOMERSTEIN	7229	8044	AUSTRIAN ROSE WINE	84-08-5420		84-08-16	CA-I-2241	TSCH-1
KLOSTERKELLER SIEGENDORF	7952	8044	RED WINE	84-08-6764		84-08-24	I-I-13	512
BLAUFRANKISCH SPATLESE	4184	8C24	RED TABLE WINE	84-08-3736		84-08-31	TX-I-576	27
BURG FORCHTENSTEIN	4184	8024	RED TABLE WINE	84-08-3735		84-08-31	TX-I-576	29
R. SCHLUMBERGER [illegible]	8680	8C24	RED AUSTRIAN WINE	84-08-6677		84-08-31	NY-I-449	302
[illegible]	4184	8C24	BLAUFRANKISCH MILD-BLUMIG	84-09-0302		84-09-06	TX-I-576	26
CABERNET-MERLOT	8680	8C24	RED WINE 1977	84-09-1507		84-09-11	NY-I-449	302
GRAND IMPERIAL BARON [illegible]	1557	8C24	PINOT NOIR RED	84-09-2426		84-09-14	PHI-I-53	AUS-11
KREMSER SANDGRUBE	4184	8044	RED WINE	84-09-2616		84-09-17	TX-I-576	24
AUSTRIAN PINOT NOIR	0789	8C24	SPATLESE	84-09-3674		84-09-21	CO-I-244	85-100J
THE PLAZA	0966	8C64	BURGENLAND PINOT NOIR-KABINETT	84-09-4874		84-09-28	NY-I-575	KS15
BLAUBURGUNDER	4119	8C24	SPATLESE 1981	84-10-1491		84-10-04	VA-I-360	5748
SCHWEGMANN	5507	8C24	BLAUFRANKISCH 1982	84-10-1019		84-10-05	LA-I-296	023
SCHWEGMANN	5507	8C24	BLAUFRANKISCH 1982	84-10-1020		84-10-05	LA-I-296	027
OSBERGER	8068	8024	OSBERGER RUBIN 1981	84-10-3065		84-10-17	IL-I-552	19086
RUST NEUSIEDLERSEE SPATLESE	9681	8064	BLAUFRANKISCH-ROTWEIN 1981	84-10-4197		84-10-18	CHI-I-69	V.W.I.I. 862
PINOT NOIR	5256	8C24	DRY RED AUSTRIAN WINE	84-10-5227		84-10-24	WI-I-447	PVVW 1140
ROTER MUSKAT	4319	8C24	BLAUFRANKISCH 1982	84-11-0575		84-11-01	VA-I-360	4790
WEISSER MUSKAT	4319	8C24	MULLER THURGAU 1982	84-11-0571		84-11-01	VA-I-360	4794
PINOT NOIR	9751	8C24	KABINETT DRY RED WINE	84-11-3135		84-11-01	VT-I-126	84115
PINOT NOIR	9751	8C24	KABINETT DRY RED WINE	84-11-3134		84-11-01	VT-I-126	84114
PRIVATE RESERVE	9751	8064	BLAUFRANKISCH DRY RED	84-11-3395		84-11-01	VT-I-126	84102
TRAPP FAMILY LODGE	9751	8C24	DRY RED WINE	84-11-0102		84-11-01	VT-I-126	84112
TRAPP FAMILY LODGE	9751	8C24	DRY RED WINE	84-11-3133		84-11-01	T-I-126	84113
RUSTER MONCH	0656	8C24	BLAUFRANKISCH	84-11-4937		84-11-29	LA-P-4440	BAB-8

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BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS
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RUSTER SPATLESE	0654	RC64	BLAUFRANKISCH 1983	84-11-4939		84-11-20	CA-P-4440	BAB-11
RUSTER BOUCH	5198	RC64	BLAUFRANKISCH 1983	84-11-5120		84-11-21	CA-I-2034	J.A.I. 16
KLOSTERKELLER SIEGENDORF	2152	RC64	PRIVATE RESERVE BLAUFRANKISCH	84-11-6458		84-11-29	NC-I-362	KS-19
KLOSTERKELLER SIEGENDORF	2152	RC64	ROSE OF PINOT NOIR KAB	84-11-6468		84-11-28	NC-I-362	KS-4
KLOSTERKELLER SIEGENDORF	2152	RC64	1982 PINOT NOIR SPAT	84-11-6471		84-11-28	NC-I-362	KS-6
KLOSTERKELLER SIEGENDORF	2152	RC64	1981 PINOT NOIR KAB	84-11-6467		84-11-28	NC-I-362	KS-3
KAISER ROSE	0488	R064	ROSE WINE	84-12-4289		84-12-21	WA-I-982	006 W
ST. LAURENT	0488	RC64	RED WINE	84-12-4290		84-12-21	WA-I-982	007 W
RED STORK	8265	R064	RUSTER BLAUFRAENKISCH	85-01-0365		85-01-31	TX-I-530	SW84-1227149
OSTERREICH	6955	RC64	WEISSBURGUNDER	85-03-0635		85-03-06	GA-I-425	012
OSTERREICH	6995	RC64	BLAUFRANKISCH	85-03-0636		85-03-06	GA-I-425	013
LENZ MOSER	1787	RC64	ST. LAURENT	85-03-1956		85-03-11		1921
SCHLOSS BAUER	9622	RC64	SPAETLESE BLAUFRAENKISCH	85-03-1190		85-03-12	IL-I-596	CH-85-008
CABERNET MERLOT	7427	R064	RED AUSTRIAN WINE	85-03-4545		95-03-26	IL-I-678	066
BLAUBURGUNDER	6319	RC64	SPATLESE PINOT NOIR	85-04-1823		85-04-09	VA-I-360	4799
ROTER HUSAR	6319	R064	CABINET BLAUFRANKISCH 1983	85-04-1824		85-04-09	VA-I-360	4798
RUSTER	8680	RC64	RED WINE	85-04-3494		85-04-16	NY-I-449	333
FALKENSTEINER	1576	RC64	BLAUER PORTUGIESER 1983	85-04-5227		85-04-24	OH-I-572	2265
WINZERGENOSSENSCHAFT GUMP. BAD	1627	RC64	*A2 GERMAN RED TABLE WINE	85-05-0199		85-05-01	CA-I-2588	741
LIEBES-OKFAN	7427	R064	BLAUFRANKISCH SPAT. TROCKEN	85-05-4578		85-05-21	IL-I-678	097
MORANDELL	0488	R064	RUSTER BLAUFRANKISCH 750ML	85-05-6454		85-05-28	WA-I-982	W 016
MORANDELL	0488	RC64	RUSTER SPATLESE 750ML- AUSTRIA	85-05-6453		85-05-28	WA-I-982	W 017
DOKTOR	7427	R064	R3 GUMPOLDSKIRCHNER CHARDONNAY	85-05-6257		85-05-28	ILL-I-678	096
SIEGENDORF	8256	RC64	PINOT NOIR DRY	85-06-2744	T85-09-05	85-06-07	CT-I-141	4024
PINOT NOIR	7364	R064	BURGENLAND KABINETT	85-06-4584		85-06-21	MD-I-242	1922
VARGOTS	5628	RC64	WINZERWEIN BLAUFRANKISCH	85-06-6565	T85-12-25	85-06-28	IO-I-254	122852
BURGENLAND PINOT NOIR	8680	R064	BLAUBURGUNDER SPATLESE	85-07-1034		85-07-09	NY-I-449	358
D. FUHS	5521	RC64	TINTO RED WINE	85-07-1344		85-07-12	WI-263	730
SIEGENDORF	9552	R064	PINOT NOIR KABINETT	85-07-1961		85-07-15	I-I-13	537
SIEGENDORF	8680	RC64	PRIVATE RESERVE	85-08-2006		85-08-13	NY-I-449	362
VOSLAUER GOLDECK CABINET	8265	R064	RED WINE 1979	85-09-1558		85-09-13	TX-I-530	SW0409098524
PRIVATE RESERVE	5256	RC64	BLAUFRANKISCH	85-10-5931		85-10-30	MI-I-447	PWVW-1435
BLAUFRANKISCH	8680	RC64	RED WINE	85-11-3211	T86-02-18	85-11-18	NY-I-449	384
SAO DOMINGOS	7273	RC64	BAIRRADA 1978	85-11-4785	T86-02-26	85-11-26	IL-I-717	2005
SAO DOMINGOS	7273	R064	DAC 1980	85-11-4786	T86-02-26	85-11-26	IL-I-717	2009
KLOSTERKELLER SIEGENDORF	4750	RC64	PINOT NOIR	86-03-1893		86-03-17	NH-I-121	302
SIEGENDORF	9552	R064	PRIVATE RESERVE	86-03-2437		86-03-20	I-I-13	3154

END OF REPORT

CERTIFICATES OF LABEL APPROVAL
C/T CODE 8164 - White Austrian Wines

BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
CERTIFICATE OF LABEL APPROVAL (COLA) SYSTEM

DATE PREPARED [illegible]

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FRAUENKIRCHNER KABINETT	8474	8164	WHITE WINE 1976	79-01-3467	C85-09-11	79-01-18		GA-I-363	0088
MONCHHOFER BEERENAUSLESE	8474	8164	WHITE WINE 1976	79-01-3464	C85-09-11	79-01-18		GA-I-363	0387
MONCHHOFER RIESLING	8474	8164	SPATLESE 1976	79-01-3466	C85-09-11	79-01-18		GA-I-363	0389
ST. GEORGENER RIESLING	8474	8164	WEISSBURGUNDER AUSLESE 1976	79-01-3463	C85-09-11	79-01-18		GA-I-363	0390
ST. MARGARETHENER RUHLAUER [illegible]	8474	8164	TROCKENBEERENAUSLESE 1976	79-01-3465	C85-09-11	79-01-18		GA-I-363	0386
KLOSTERKELLER SIEGENDORF	0566	8164	SCHLOSSWEIN	79-07-2388	C79-10-03	79-07-09		NY I 575	
KLOSTERKELLER SIEGENDORF	0566	8164	MULLER THURGAU	79-07-2089	C79-10-03	79-07-09		NY I 575	
WEINGUT JULIUS HAFNER	1627	8164	RUSTER CLAWEIN	79-07-2302		79-07-09		CAL I 398	
KLOSTERKELLER SIEGENDORF	0566	8164	SCHLOSSWEIN	79-07-2087	C79-10-18	79-07-19		NY I 575	
JAKOB HEURIGER 1976	6803	8164	GUPP SPAETLESE	79-07-1739	00 00 00	79-07-19		IL I 445	
KLOSTERKELLER SIEGENDORF	0566	8164	GUMPOLDSKIRCHNE	79-07-2086	00 00 00	79-07-24		NY I 575	
DOKTOR THEOD KABINETT	1882	8164	GUMPOLDSKIRCHNE	79-07-2355	00 01 00	79-07-26		VA I 298	
DONNERSKIRCHEN	1882	8164	SUNNENBERG	79-07-2357	00 00 00	79-07-26		VA I 298	
KREMSER SANDGRUBE	1882	8164	1978	79-07-2356	00 00 00	79-07-26		VA I 294	
HEURIGER	8183	8164	AUSTRIAN RSLNG	79-08-1777		79-08-02		NY I 449	
ST MARTINUS	1882	8164	BLAUFRANKISCH	79-08-2198		79-08-10		VA I 298	
ST MARTINUS	1882	8164	SPATLESE	79-08-2199		79-08-10		VA I 298	
ST MARTINUS	1882	8164	GRUNER VELTLINE	79-08-2200		79-08-10		VA I 298	
KLOSTERKELLER SIEGENDORF	0566	8164	GEWURZTRAMINER	79-08-2063		79-08-13		NY I 575	
KLOSTERKELLER SIEGENDORF	0566	8164	MUSKAT OTTONEL	79-08-2064		79-08-13		NY I 575	
MULLER THURGAU	0566	8164	AUSLESE	79-08-2062		79-08-13		NY I 575	
WEINSTEIGER	1882	8164	NEUBURGER RSLNG	79-08-2197		79-08-13		VA I 298	
KREMSER	0615	8164	JUNGFRAU	79-08-1957		79-08-14		FL I 572	
KREMSER WEINGARTEN	0615	8164	OSTERREICH	79-08-1956	T79-08-18	79-08-14		FL I 572	
TOWER OF KREMS	0615	8164	OSTERREICH	79-08-1958		79-08-14		FL I 572	
GUMPOLDSKIRCHNER	1593	8164	DOKTOR	79-08-2167		79-08-23		I 549	
EDELWEISS	2028	8164	GUMPOLDSKIRCHNE	79-08-2257		79-08-23		I 185	
JAKOB GERHARD	3427	8164	OESTERREICH	79-08-2390		79-08-23		ILL I 415	
HEURIGER	4598	8164	AUSTRAIN RSLNG	79-08-2687		79-08-24		ILL I 415	
OSTERREICH	4598	8164	KUHNS AUST RSLN	79-08-2688		79-08-27		ILL I 415	
LEONHARD KARUSCH	4756	8164	ANNABERG	79-08-2783	T79-11-28	79-08-29		4 I 133	
LEONHARD KARUSCH	4756	8164	DANUBE VALLEY	79-08-2781	T79-11-28	79-08-28		4 I 133	
LEONHARD KARUSCH	4756	8164	FLAKENSTEINER	79-08-2782		79-08-28		4 I 133	
LEONHARD KARUSCH	4756	8164	SCHONBRUNNER	79-08-2780	T79-11-28	79-08-28		4 I 133	
RUDOLF MULLER	4756	8164	PIES GOLD	79-08-2784		79-08-28		IOWA I 286	
AUSLESE TROCKENBEERENAUSLESE	0454	8164	WINZER VERBAND	79-08-1678		79-08-31		TX I 426	
ZENTRALKELLEREI	0454	8164	K. BEERENAUSLESE	79-08-1679		79-08-31		TX I 426	
GRUNER KAST	1557	8164	WHITE	79-09-1863		79-09-04		PHI I 53	
GRINZINGER REISENBERG	1557	8164	AUSTRIAN	79-09-1865		79-09-04		PHI I 53	
GUMPOLDS KIRCHNER	1557	8164	GLD ZIERFANDLER	79-09-1858		79-09-04		PHI I 53	
GUMPOLDS KIRCHNER	1557	8164	SPATLESE	79-09-1864		79-09-04		PHI I 53	
KREMSER WEINBERG	1557	8164	R S GRNR VELTNR	79-09-1860		79-09-04		PHI I 53	
OSTERREICH	1557	8164	GRUNER VELTLINE	79-09-1861		79-09-04		PHI I 53	
OSTERREICH KREMS WACHAU	1557	8164	WALZERKONIG	79-09-1869		79-09-04		PHI I 53	
ST MARTINUS	1557	8164	BLAUFRANKISCH	79-09-1862	T79-12-17	79-09-04		PHI I 53	
VOGEL WEIDER	1557	8164	GRUNER VELT	79-09-1859		79-09-04		PHI I 53	
ZIMMERMANN GRAFF	0682	8164	LP DANASL	79-09-1663		79-09-06		WIS I 279	
ZIMMERMANN GRAFF	0682	8164	RSLN AUSL FA	79-09-1662		79-09-06		WIS I 279	
KLOSTERKELLER SIEGENDORF	0566	8164	SCHLOSSWEIN	79-09-1775		79-09-06		NY I 575	
KLOSTERKELLER SIEGENDORF	0566	8164	GR RIESLING	79-09-1776		79-09-06		NY I 575	
KLOSTERKELLER SIEGENDORF	0566	8164	GEWURZTRAMINER	79-09-1773		79-09-06		NY I 575	
KLOSTERKELLER SIEGENDORF	0566	8164	RHEINRIESLING	79-09-1774		79-09-06		NY I 575	
DONNERSKIRCHNER SONNENBERG	1557	8164	TRAMINERAUSL	79-09-1866		79-09-07		PHI I 53	
GUMPOLDSKIRCHNER	1557	8164	AUSTRIAN WHT	79-09-1868		79-09-07		PHI I 53	
OSTERREICH	1557	8164	GR IMPERIAL 77	79-09-1867		79-09-07		PHI I 53	

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BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS
CERTIFICATE OF LABEL APPROVAL (COLA) SYSTEM

BRAND NAME	VEND CODE	C/T CODE	CLASS/TYPE (C/T) DESCRIPTION	DOCUMENT SERIAL NBR	CANCEL OR TEMP DATE	DATE OF APPROVAL	FORM	PLANT OR PERMIT NBR	APPLICANT SERIAL NBR
KLOSTERKELLER SIEGENDORF	0966	8164	JOHNSBRG RSL	79-09-1772		79-09-13		NY I 575	
JAKOB DEMMER	6803	8164	KOENIGSBRUNNER	79-09-2700		79-09-17		ILL I 445	
SCHLTERHOF WEINGUT WEINKELLER	7135	8164	B BEERENAUSLESE	79-09-2752		79-09-24		ILL I 446	
KEMESSEY	6839	8164	ST MARGARETHENE	79-09-2659		79-09-26		ILL I 445	
HEURIGER	3080	8164	AUSTRAIN RSLNG	79-10-2362		79-10-22		CHI I 257	
KREMSER JUNGFRAU	3080	8164	WHITE WINE	79-10-2363		79-10-22		CHI I 257	
WINGEM AFLDEN AUSLESE	6809	8164	1976	79-10-3218		79-10-23		ILL I 445	
GUMPOLDSKIRCHNER	6809	8164	SPAT 1976	79-10-3219		79-10-23		ILL I 445	
DURNSTEINER KATZENSPRUNG	1882	8164	GRUNER VELT	79-10-2024		79-10-26		VA I 298	
SCHLOSSWEINGUT FRH V GEYMULLER	1882	8164	K HOLLENBURG	79-10-2025		79-10-26		VA I 298	
GUMPOLDS KIRCHNER	2028	8164	SPT ROTGIPSSLER	79-10-2056		79-10-26		I 105	
APETLONER BEERENAUSLESE	7147	8164	1976	79-11-3204		79-11-01		KY I 309	
RUSTER AUSLESE	7147	8164	1976	79-11-3203		79-11-01		KY I 309	
ST MARGARETHEN SPATLESE	9843	8164	TRMNR MUS OTTON	79-11-4045		79-11-01		IL I 543	
MORANDELL FALKENSTEINER	8508	8164	GRUNER VELTLING	79-11-3557		79-11-05		NY I 345	
MORANDELL GUMPOLDSKIRCHNER	8508	8164	ZIERFANDLER	79-11-3555		79-11-05		NY I 345	
MORANDELL KREMSER SANDGRUB	8508	8164	MULLER THURGAU	79-11-3558		79-11-05		NY I 345	
MORANDELL RUSTER	8508	8164	TROCKENBERNAUS	79-11-3561		79-11-05		NY I 345	
MORANDELL RUSTER AUSLESE	8508	8164	1977	79-11-3556		79-11-05		NY I 345	
MORANDELL RUSTER BEERENAUSLESE	8508	8164	1977	79-11-3562		79-11-05		NY I 345	
MORANDELL RUSTER SPATLESE	8508	8164	1977	79-11-3560		79-11-05		NY I 345	
MORANDELL STEINER HUND	8508	8164	RHEINRIESLING	79-11-3559		79-11-05		NY I 345	
HEURIGER AUSTRIAN	1627	8164	RSLNG 1978	79-11-2373		79-11-08		CA I 898	
TROCKENBEERENAUSLESE	4660	8164	PINOT BLANC	79-12-1949	T80-02-08	79-11-09		MN I 321	
GRUNVELTLINER	4660	8164	KAB	79-11-2842	T80-02-08	79-11-09		MN I 321	
GUMPOLDSKIRCHNER	4660	8164	KAB	79-11-2840	T80-02-08	79-11-09		MN I 321	
GEWURZTRAMINER	4660	8164	KAB	79-11-2839	T80-02-08	79-11-09		MN I 321	
MULLER THURGAU	4660	8164	KAB	79-11-2841	T80-02-08	79-11-09		MN I 321	
SCHLOSSWEIN	4660	8164	KAB	79-11-2843	T80-02-08	79-11-09		MN I 321	
SCHLOSSWEIN	4660	8164	RSLNG KAB	79-11-2844	T80-02-08	79-11-09		MA I 321	
MORANDELL RUSTER	8508	8164	TROCKENBLLRENAU	79-11-3553		79-11-19		NY I 345	
MORANDELL RUSTER AUSLESE	8508	8164	WEISSBURGUNDER	79-11-3992		79-11-19		NY I 345	
MORANDELL RUSTER BEERENAUSLESE	8508	8164	WEISBURGUNDER	79-11-3551		79-11-19		NY I 345	
MORANDELL RUSTER SPATLESE	8508	8164	NEUBURGER	79-11-3554		79-11-19		NY I 345	
ILLMITZER KAISERGARTEN	7135	8164	SPAT 1978	79-11-3177		79-11-27		ILL I 446	
SCHLOSSWEIN	0966	8164	1978	79-11-2241		79-11-29		NY I 575	
GUMPOLDSKIRCHNER SPATLESE	6809	8164	1976	79-11-3106		79-11-29		ILL I 445	
GUMPOLDS KIRCHNER	3080	8164	DR LUEGER	79-12-1694		79-12-12		CHI I 257	
NEUSIEDLER	3080	8164	RSL	79-12-1695		79-12-12		CHI I 257	
OSTERREICH KREMSER	3080	8164	WINZERKRAUT	79-12-1696		79-12-12		CHI I 257	
OSTERREICH KREMSER GOLDBERG	3080	8164	1977	79-12-1699		79-12-12		CHI I 257	
OSTERREICH KREMSER ROSENGARTEN	3080	8164	1976	79-12-1700		79-12-12		CHI I 257	
OSTERREICH KREMSER SCHMIDT	3080	8164	1976	79-12-1698		79-12-12		CHI I 257	
OSTERREICH TIMER OF KREMS	3080	8164	AUS 1976	79-12-1697		79-12-12		CHI I 257	
FALKENSTEINER	8508	8164	GRUNER VELT	79-12-2505		79-12-18		NY I 345	
GUMPOLDSKIRCHNER	8508	8164	ZIERFANDLER	79-12-2504		79-12-18		NY I 345	
KREMSER SANDGRUB	8508	8164	MULLER THURGAU	79-12-2509		79-12-18		NY I 345	
RUSTER AUSLESE	8508	8164	WEISSBURGUNDER	79-12-2507		79-12-18		NY I 345	
RUSTER BEERENAUSLESE	8508	8164	WEISSBURGRNDER	79-12-2502		79-12-18		NY I 345	
RUSTER SPATLESE	8508	8164	NEUBURGER	79-12-2506		79-12-18		NY I 345	
RUSTER TROCKENBEERENAUSLESE	8508	8164	MULLER THURGAU	79-12-2508		79-12-18		NY I 345	
STEINER HUND	8508	8164	RHEINRIESLING	79-12-2503		79-12-18		NY I 345	
LENZ MOSER	8112	8164	BLUE DANUBE	80-01-1816		80-01-02		NY I 35	
GUMPOLDS KIRCHNER	1627	8164	SPAT	80-01-1336		80-01-09		CA I 898	
ST MARGARETHENER	8474	8164	B BEERNAUS	80-01-1829	C85-09-11	80-01-22		GA I 363	0206

DATE PREPARED: 09 JUN 86

BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS
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BRAND NAME	VEND	C/T CCLF	CLASS/TYPE (C/T) DESCRIPTION	DOCUMENT SERIAL NBR	CANCEL OR TEMP DATE	DATE OF APPROVAL FORM	PLANT OR PERMIT NBR	APPLICANT SERIAL NBR
WINZERGENOSSENSCHAFT GUMPOLDSK	0615	8164	DR LUEGER	80-01-1231		80-01-24	FL I 572	
LANGENLOISER KIRCHENGARTEN	3960	8164	1973	80-01-1500		80-01-25	I 1001	
LANGENLOISER STEINHAUS	3960	8164	1971	80-01-1498		80-01-25	I 1001	
LANGENLOISER TAUBENBURG	3963	8164	1971	80-01-1499		80-01-25	I 1001	
AUSTRIAN PINOT BLANC	0054	8164	WHT	80-01-1201		80-01-28	TX I 426	
AUSTRIAN PINOT BLANC	0054	8164	WHT	80-01-1202		80-01-28	TX I 426	
RUSTER EISWEIN	0356	8164	RSL AUS	80-01-1199		80-01-28	TX I 426	
SONNENRUDE WEISE	0056	8164	1978	80-01-1200		80-01-28	TX I 426	
BREITENBRUNNER BEERENAUSLESE	7135	8164	1978	80-02-2540		80-02-06	ILL I 446	
MONCHHOFER KAISERGARTEN	7135	8164	SPAT 1979	80-02-2539		80-02-06	ILL I 446	
RETZER SANDGRABEN	7135	8164	1979	80-02-2538		80-02-06	ILL I 446	
ILLMITZER KAISERGARTEN	7135	8164	SPAT 1979	80-02-2536		80-02-19	ILL I 446	
ILLMITZER KAISERGARTEN	7135	8164	SPAT 1979	80-02-2537		80-02-19	ILL I 446	
MONCHHOFER KAISERGARTEN	7135	8164	BEERNAUS 79	80-02-2535		80-02-19	ILL I 446	
GRUNVELTLINER	0054	8164	KAB	80-02-1739		80-02-21	TX I 426	
GEWURZTRAMINER	0354	8164	SPAT	80-02-1740		80-02-22	TX I 426	
AUSTRAIN PINOT BLANC	0766	8164	KAB	80-02-1925		80-02-22	NY I 575	
GUMPOLDSKIRCHNER	8504	8164	ZIERFANDLER	80-03-2763		80-03-05	NY I 345	
KREMSER SANDGRUBE	8508	8164	M THURGAU	80-03-2764		80-03-05	NY I 345	
MORANDELL	8508	8164	RUSTER AUS	80-03-2759		80-03-05	NY I 345	
MORANDELL	8508	8164	FALKENSTEINER	80-03-2758		80-03-05	NY I 345	
RUSTER BEERENAUSLESE	8508	8164	WEISSBURGUNDER	80-03-2761		80-03-05	NY I 345	
RUSTER SPATLESE	8508	8164	NEUBURGER	80-03-2762		80-03-05	NY I 345	
RUSTER TROCKENBEERENAUSLESE	8508	8164	M THURGAU 78	80-03-2760		80-03-05	NY I 345	
STEINER HUND	8508	8164	RHEINRIESLING	80-03-2765		80-03-05	NY I 345	
GRINLING	4550	8164	Z AUS	80-03-2268		80-03-19	ILL I 415	
SPATROT RUEGIPFLER	4990	8164	SPAT	80-03-2269		80-03-19	ILL I 415	
MONCHHOFER DAISERGARTEN	1735	8164	BEERNAUS 1979	80-03-1911		80-03-31	ILL I 446	
MONCHHOFER KAISERGARTEN	1735	8164	BEERNAUS 79	80-03-1910		80-03-31	ILL I 446	
SCHLOSSWEIN	0366	8164	MULL THUR KAB	80-04-2341		80-04-02	NY I 575	
KREMSER WACHTBERG	1590	8164	G VELTLINER	80-04-2444		80-04-03	I 549	
AUSTRIAN CELLAR WINES	0430	8164	GUMPOLDSKIRCHNE	80-04-2192		80-04-08	FL I 635	
AUSTRIAN CELLAR WINES	0430	8164	GUMPOLDSKIRCHNE	80-04-2194		80-04-08	FL I 635	
AUSTRIAN CELLAR WINES	0430	8164	GRUNER VALTINER	80-04-2191		80-04-08	FL I 635	
AUSTRIAN CELLAR WINES	0430	8164	RHEINRIESLING	80-04-2193		80-04-08	FL I 635	
KREMSER GRUNER VELTLINER	8463	8164	1978	80-04-3702		80-04-09	CO I 205	
GUMPOLDSKIRCHNER	6899	8164	SPAT 1977	80-04-3324		80-04-17	ILL I 445	
EDELSTALER TROCKENBEERENAUSLES	7135	8164	1979	80-04-3393		80-04-17	ILL I 446	
RETZER SANDGRABEN	7135	8164	1979	80-04-3392		80-04-17	ILL I 446	
DONAUBURG	9779	8164	DANUBE CASTLE	80-04-4160	T80-07-17	80-04-17	NC I 324	
DONAURIESLING	0219	8164	1978	80-04-2156		80-04-18	TX I 249	
KREMSER ROSE	0219	8164	1978	80-04-2157		80-04-18	TX I 249	
KREMSER SANDGRUBE	0219	8164	1978	80-04-2158		80-04-18	TX I 249	
DONNERSKIRCHNER SONNENBERG	4598	8164	SPAT	80-04-2909		80-04-21	ILL I 415	
FREIHOFER VON LEISSER	4558	8164	THERMENAUS	80-04-2910		80-04-21	LL I 415	
SANDUSSEL	0063	8164	POYSDORFER	80-04-2023	T80-05-12	80-04-28	A I 1081	
KREMSER JUNGFRAU	0219	8164	1976	80-04-2159	T80-07-29	80-04-30	X I 249	
KREMSER WACHTBERG	1590	8164	G VELTLINER	80-04-2443		80-04-30	549	
BEERENAUSLESE	0966	8164	GEWURZTRAMINER	80-05-1988		80-05-05	NY I 575	
RUSTER EISWEIN	0366	8164	RSL AUS	80-05-1986		80-05-05	NY I 575	
GUMPOLDSKIRCHNER	0219	8164	GOLD	80-05-1877		80-05-16	TX I 249	
DONAUBURG	9196	8164	DANUBE CASTLE	80-05-3992		80-05-14	2 I 300	
ST MICHAEL	4756	8164	LIEBFRAUMILCH	80-05-2873		80-05-15	4 I 133	
DONAUBURG	9156	8164	DANUBE CASTLE	80-05-3988	T80-09-14	80-05-15	2 I 300	
SCHWARZE KATZCHEN	4756	8164	WHT	80-05-2874		80-05-27	4 I 133	

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DR LIEGER	0219	8164	WHT	80-05-1868		80-05-28		TX I 249	
SPATROT ROTGIPFLER	0219	8164	SPAT	80-05-1876	T80-08-26	80-05-28		TX I 249	
TYNES	6781	8164	MOSELLE	80-05-2745		80-05-28		CH I 689	
YOUNGER	6024	8164	WHT STILL	80-05-3107		80-05-30		I 1480	
WINZERGENOSSENSCHAFT KREM WAI	8164	8164	1978 STL WHT	80-06-4207		80-06-06		NY I 803	
WINZERGENOSSENSCHAFT KREM WAI	8164	8164	1978 STL WHT	80-06-4208		80-06-06		NY I 803	
REICHSGRAF VON INGELHEIM	7135	8164	1979 WEI U TH	80-06-3767		80-06-12		IL I 446	
ZIMMERMANN GRAFFE	9975	8164	1979 GR WHT TBL	80-06-4782		80-06-12		MI I 430	
SCHLOSS KIRCHBERG KREMSER WACH	1593	8164	WHT AUSTRIAN	80-06-2405		80-06-16		NY I 545	
KLOSTERNEUBURG	6024	8164	1979 KLOSTERDAM	80-06-3526		80-06-19		NY I 1480	
WEINGUT ELFENHOF	5976	8164	1977 RUSTER TRA	80-06-3523		80-06-23		NY I 205	
KLOSTERKELLER SIEGENDORF BEERE	1932	8164	WHT TBLE	80-06-2595		80-06-26		9 I 254	
KLOSTERKELLER SIEGENDORF 'CHLO	1932	8164	WHT TBLE 1979	80-06-2593		80-06-26		9 I 254	
KLOSTERKELLER SIEGENDORF 'CHLO	1932	8164	WHT TBLE 1979	80-06-2594		80-06-26		9 I 254	
HAMILTON	2028	8164	WINE U/144	80-06-2602		80-06-30		IL I 185	
REICHSGRAF VON INGELHEIM	7135	8164	1979 QUAL	80-06-3716		80-06-30		ILL I 446	
KLOSTERKELLER SIEGENDORF	0054	8164	PINOT NOIR	80-07-1809		80-07-02		TX I 426	
KLOSTERKELLER SIEGENDORF	0054	8164	GUMPOLDSKIRCHNE	80-07-1808		80-07-02		TX I 426	
KLOSTERKELLER SIEGENDORF	0054	8164	GEWURZTRAMINER	80-07-1810		80-07-02		TX I 426	
KLOSTERKELLER SIEGENDORF	4660	8164	WHITE WINE	80-07-3198		80-07-10		MN I 321	
KLOSTERKELLER SIEGENDORF	4660	8164	WHITE WINE	80-07-3193		80-07-10		MN I 321	
MULLER THURGAU	4660	8164	WHITE WINE	80-07-3196		80-07-10		MN I 321	
MUSKAT OTTONEL	4660	8164	WHITE WINE	80-07-3197		80-07-10		MN I 321	
SCHLOSSWEIN	4660	8164	1979 WHITE WINE	80-07-3194		80-07-10		MN I 321	
SCHLOSSWEIN MULLER THURGAU	4660	8164	1979 WHITE WINE	80-07-3195		80-07-10		MN I 321	
GUMPOLDSKIRCHNER	6809	8164	1978 WHITE WINE	80-07-3866		80-07-15		IL I 445	
WEINGUT SONNENHOF	0862	8164	WHITE WINE	80-07-2136		80-07-16		I 56	
WEINGUT SONNENHOF	0862	8164	WHITE	80-07-2134		80-07-16		I 56	
WEINGUT SONNENHOF	0862	8164	WHITE	80-07-2135		80-07-16		I 56	
KLOSTERKELLER SIEGENDORF	0054	8164	GEWURZTRAMINER	80-07-1811		80-07-18		TX I 426	
GRUNER VELTLINER	5294	8164	1979 WTW	80-07-3547		80-07-18		MI I 447	
KLOSTERKELLER SIEGENDORF	5294	8164	WTW	80-07-3550		80-07-18		MI I 447	
KLOSTERKELLER SIEGENDORF	5294	8164	1979 WTW	80-07-3548		80-07-18		MI I 447	
KLOSTERKELLER SIEGENDORF	5294	8164	WTW	80-07-3551		80-07-18		MI I 447	
KLOSTERKELLER SIEGENDORF	5294	8164	1979 WTW	80-07-3549		80-07-18		MI I 447	
GRUNVELTLINER	3856	8164	WTW	80-07-2911		80-07-21		O I 327	
GUMPOLDSKIRCHNER	3856	8164	WTW	80-07-2910		80-07-21		O I 327	
KLOSTERKELLER SIEGENDORF	3856	8164	WTW	80-07-2912		80-07-21		O I 327	
KLOSTERKELLER SIEGENDORF	3856	8164	WTW	80-07-2909		80-07-21		O I 327	
KLOSTERKELLER SIEGENDORF	0054	8164	PINOT BLANC	80-07-1807		80-07-22		TX I 426	
KLOSTERKELLER SIEGENDORF	0054	8164	RIESLING	80-07-1806		80-07-22		TX I 426	
GRINZINGER REISENBERG	0615	8164	AUSTRIAN WHT	80-07-2066		80-07-22		FL I 572	
KLOSTERKELLER SIEGENDORF	0615	8164	SCHLOSSWEIN	80-07-2067		80-07-22		FL I 572	
KLOSTERKELLER SIEGENDORF	0615	8164	TROCKENBEERENAU	80-07-2063		80-07-22		FL I 572	
KLOSTERKELLER SIEGENDORF	0615	8164	RUSTER EISWEIN	80-07-2064		80-07-22		FL I 572	
KLOSTERKELLER SIEGENDORF	0615	8164	PINOT BLANC	80-07-2062		80-07-22		FL I 572	
KLOSTERKELLER SIEGENDORF	0615	8164	MUSKAT OTTONEL	80-07-2065		80-07-22		FL I 572	
BURGENLANDER	6804	8164	1979 WHITE WINE	80-07-3867		80-07-30		IL I 445	
KLOSTERNEUBURG	6024	8164	1979 WHITE	80-07-3653		80-07-31		I 1480	
FREIGUT THALLERN 1974	7486	8164	SPATLESE	80-07-4056		80-07-31		CK I 217	
FREIGUT THALLERN 1974	7486	8164	RIED STUDENT	80-07-4055		80-07-31		CK I 217	
MAGIC FLUTE	4593	8164	AUS WHT TBL	80-08-3177A		80-08-01		NY I 345	
GOLDENER STORCH	8671	8164	1978 WHITE WINE	80-08-3213		80-08-01		CHI I 189	
KLOSTERNEUBURG	6024	8164	1979 GRUN VELT	80-08-2529	T80-09-04	80-08-14		NY I 1409	
KLOSTERKELLER SIEGE	5660	8164	GEWURZTRAM KAB	80-08-2322	T80-10-07	80-08-07		MN I 321	

DATE PREPARED: 19 JUN 86

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KLOSTERKELLER SIEGENDORF	4560	8164	GEWURZTR AUS	80-08-2321	T8 -10-07	80-08-07		MI I 321	
GOLDENER STORCH	9671	8164	1977 WHITE WIN	80-08-3209		80-08-07		CHI I 189	
SCHLOSSWEIN	9446	8164	1978 WHITE WINE	80-08-3443		80-08-13		WA I 889	
SCHLOSSWEIN	9446	8164	1978 WHITE WINE	80-08-3442		80-08-13		WA I 899	
DINKATEN WEIN	0719	8164	WHT TBL	80-08-1416	T80-11-13	80-08-14		TX I 249	
SANDUSSEL	0719	8164	GR VELTINER	80-08-1417	T80-11-13	80-08-14		TX I 249	
ST GEORGENER	9456	8164	1979 WHITE WINE	80-08-3467		80-08-15		IL I 587	
WEINGUT ELFENHOF	5976	8164	1976 RUST TRUCK	80-08-2521		80-08-19		NY I 205	
WEINGUT ELFENHOF	5976	8164	1976 RUSTER GEW	80-08-2518		80-08-19		NY I 205	
WEINGUT ELFENHOF	5976	8164	1976 RUSTER RHE	80-08-2520		80-08-19		NY I 205	
WEINGUT ELFENHOF	5976	8164	1976 RUSTER MUL	80-08-2519		80-08-19		NY I 205	
WEINGUT ELFENHOF	5976	8164	1976 AUS BEEREN	80-08-2522		80-08-19		NY I 205	
KREMSER	4933	8164	1978 MUSKAT OTT	80-08-2365		80-08-21		CO I 234	
KREMSER ENGELSTEIN	4933	8164	1978 RIES SYLV	80-08-2372		80-08-21		CO I 234	
KREMSER JUNGFRAU	4933	8164	GRUNER VELTLINE	80-08-2369		80-08-21		CC I 234	
KREMSER ROSENGARTEN	4933	8164	OSTER GRUN VELT	80-08-2367		80-08-21		CO I 234	
KREMSER SANDGRUBE	4933	8164	GRUNER VELTLINE	80-08-2370		80-08-21		G I 234	
KREMSER SCHMIDT	4933	8164	GRUNER VELTNER	80-08-2368		80-08-21		CO I 234	
WINZER KREMS	4933	8164	1978 AUST RIES	80-08-2366		80-08-21		CO I 234	
WINZER KREMS	4933	8164	1979 HEUR AUST	80-08-2371		80-08-21		CO I 234	
GOBSWEINGUT	8164	8164	1979 RUSTER TRO	80-08-2364		80-08-21		CO I 234	
DR. LUEGER	8671	8164	WHITE WINE	80-08-3211		80-08-21		CHI I 189	
GUMPOLDS	8671	8164	WHITE WINE	80-08-3212		80-08-21		CHI I 189	
MAGIC FLUTE	8508	8164	AUS WIT TBL	80-08-3177		80-08-25		NY I 345	
MAYER	8680	8164	WHITE AUSTRIAN	80-09-3956		80-09-09		NY I 449	
ZIMMERMAN GRAFFE	7147	8164	WHITE STILL AUS	80-09-3587		80-09-10		KY I 346	
KARL WALDER	0175	8164	NEUSIEDLER WHIT	80-09-2284		80-09-11		PHI I 192	
KLOSTERKELLER SIEGENDORF SCHLO	0054	8164	WHITE TABLE WIN	80-09-2263		80-09-19		TX I 426	
KLOSTERKELLER SIEGENDORF SCHLO	0094	8164	WHITE TABLE WIN	80-09-2261		80-09-19		TX I 426	
KLOSTERKELLER SIEGENDORF SCHLO	0094	8164	WHITE TABLE WIN	80-09-2262		80-09-19		TX I 426	
GUMPOLDSKIRCHNER GELD ZIF-FAN	4933	8164	AUSTRIAN LIGHT	80-09-3118		80-09-19		CCLO I 234	
GUMPOLDSKIRCHNER SPATROT ROTG	4933	8164	AUSTRIAN LIGHT	80-09-3119		80-09-19		CCLO I 234	
DONAUBURG	9779	8164	AUSTRIAN TBL WH	80-09-4202		80-09-19		MC I 324	
AUSTRIAN PLAIN WANE	9779	8164	AUSTRIAN TBL WH	80-09-4201		80-09-23		MO I 324	
GRUNVELTLINER	9779	8164	AUSTRIAN TBL WH	80-09-4198		80-09-23		MC I 324	
GRUNVELTLINER	9779	8164	AUSTRIAN TBL WH	80-09-4199		80-09-23		MO I 324	
RUSTER EISWEIN	9779	8164	AUSTRIAN TBL WH	80-09-4203		80-09-23		MC I 324	
SCHLOSSWEIN	9779	8164	AUSTRIAN TBL WH	80-09-4197		80-09-23		MC I 324	
SCHLOSSWEIN	9779	8164	AUSTRIAN TBLWH	80-09-4196		80-09-23		MO I 324	
SCHLOSSWEIN	9779	8164	AUSTRIAN TBL WH	80-09-4195		80-09-23		M O I 324	
JAKOB DEMMER	6809	8164	ST GRGNR	80-10-3521		80-10-01		ILL I 445	
PFAFFENBERG	8683	8164	WIT AUSTRIAN WH	80-10-4056		80-10-01		NY I 449	
GUMPOLDSKIRCHNER	8680	8164	WIT AUSTRIAN WH	80-10-4057		80-10-02		NY I 449	
WINZERGENOSSENSCHAFT KREMS	8683	8164	1978 WHT WH	80-10-4058		80-10-02		NY I 449	
BONSAI SEGGERMAN	0966	8164	TBL WH	80-10-2110		80-10-16		NY I 575	
BONSAI SEGGERMAN & CO	0966	8164	TBL WH1978	80-10-2111		80-10-16		NY I 575	
AUSTRIAN CELLAR WH	0430	8164	WHT WH1978	80-10-1936		80-10-20		FL I 635	
AUSTRIAN CELLAR WH	0430	8164	WHT WH	80-10-1934		80-10-20		FL I 635	
AUSTRIAN CELLAR WH	0430	8164	WIT WH1978	80-10-1933		80-10-20		FL I 635	
RHEINRIESLING	0430	8164	WIT WH	80-10-1935		80-10-20		FL I 635	
ZIMMERMANN GRAFFE	0682	8164	1979 RUSTER AUS	80-10-2060		80-10-21		WIS I 279	
ZIMMERMANN GRAFFE	0682	8164	1979 RHEIN [illegible]	80-10-2061		80-10-21		WIS I 279	
ZIMMERMANN GRAFFE	0682	8164	1979 RUSTER SPA	80-10-2062		80-10-21		WIS I 279	
RHEINRIESLING	1992	8164	WHT WH	80-10-2299		80-10-22		VA I 298	
JF KREMS	9975	8164	WIT TBL WH1979	80-10-4312		80-10-22		MI I 499	

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DONAUBURG	0430	8164	1978 WTW	80-11-2710		80-11-03		FL I 635	
DONAUBURG	0433	8164	1978 WTW	80-11-2711		80-11-03		FL I 635	
DUKATEN WEIN	0430	8164	1978 WTW	80-11-2713		80-11-03		FL I 635	
SAUMUSSEL	0433	8164	1978 WTW	80-11-2712		80-11-03		FL I 635	
LANGENLOISER	3642	8164	1979 WHT WNE	80-11-3461		80-11-03		MASS I 141	
LOISER STEINHAUS	3642	8164	1979 KAB	80-11-3460		80-11-03		MASS I 141	
LOISER STEINHAUS	3642	8164	1979 RSL UMT	80-11-3462		80-11-03		MASS I 141	
FOELSTALLER KAISERGARTEN 1977	7135	8164	TRKNBRNAUSL	80-11-4302		80-11-06		ILL I 446	
PODERSDORFER 1979	7135	8164	SPATLESE	80-11-4300		80-11-06		ILL I 446	
PODERSDORFER 1979	7135	8164	BEERENAUSLESE	80-11-4301		80-11-06		ILL I 446	
BURGENLAND 1976	6807	8164	ST GEORG TROCK	80-11-4258		80-11-14		ILL I 445	
BURGENLAND 1979	6809	8164	ST MARG AUSL	80-11-4260		80-11-14		ILL I 445	
DONAULAND 1976	6809	8164	K SPATLESE	80-11-4257		80-11-14		ILL I 445	
GUMPOLDSKIRCHNER 1979	6809	8164	SPATLESE	80-11-4259		80-11-14		ILL I 445	
NEUSIEDLER SEE	5825	8164	1977 SPAT	80-11-4982		80-11-18		MI I 436	
DURNSTEINER HOLLERIN	0966	8164	1978 RSL	80-11-2896		80-11-26		NY I 575	
DURNSTEINER KATZENSPRUNG	0966	8164	1978 WHT TBL	80-11-2897		80-11-26		NY I 575	
ANONE	0430	8164	WEISSBURGUNDER AUSLESE 76	80-12-1478		80-12-01		FL-1-635	2877
ARISTOKRAT	0430	8164	TRAMINER KABINETT 79	80-12-1490		80-12-01		FL-1-635	1677
ARISTOKRAT	0430	8164	RHEINRIESLING KABINETT 77	80-12-1489		80-12-01		FL-1-635	1777
ARISTOKRAT	0433	8164	MUSKAT OTTONEL SPATLESE 76	80-12-1487		80-12-01		FL-1-635	1977
ARISTOKRAT	0430	8164	WEISSBURGUNDER SPATLESE 76	80-12-1486		80-12-01		FL-1-635	2077
ARISTOKRAT	0433	8164	MUSKAT OTTONEL SPATLESE 79	80-12-1488		80-12-01		FL-1-635	1877
MAJESTY	0430	8164	WEISSBURGUNDER BEERENAUSLESE 73	80-12-1482		80-12-01		FL-1-635	2477
MAJESTY	0430	8164	BOUVIERTRAUBE TROCKENBEERENAUS	80-12-1481		80-12-01		FL-1-635	2577
MAJESTY	0430	8164	TRAMINER AUSLESE 75	80-12-1484		80-12-01		FL-1-635	2277
MAJESTY	0430	8164	TRAMINER BEERENAUSLESE 76	80-12-1483		80-12-01		FL-1-635	2377
MAJESTY	0433	8164	RULANDER AUSLESE 77	80-12-1485		80-12-01		FL-1-635	2177
RUSTER EISWEIN	0430	8164	WEISSBURGUNDER AUSLESE 78	80-12-1477		80-12-01		FL-1-635	2977
TURMRIESLING	0430	8164	WELSCHRIESLING KABINETT 79	80-12-1479		80-12-01		FL-1-635	2777
TURMRIESLING	0433	8164	WELSCHRIESLING SPATLESE 79	80-12-1480		80-12-01		FL-1-635	2677
MITTELBERGER	3642	8164	MULLER-THURGAU WHITE WINE	80-12-1986		80-12-01		MA-1-141	WW-10228-G
STEINFEDER	3642	8164	GRUNER VELTLINER WHITE WINE	80-12-1985	T81-02-27	80-12-01		MA-1-141	WWW-10228-C
STEINFEDER	3642	8164	WELSCHRIESLING WHITE WINE	80-12-1984	T81-02-27	80-12-01		MA-1-141	WWW-10228-E
RUSTER EISWEIN	4598	8164	WHITE STILL WINE	80-12-2139		80-12-01		III-1-415	A906
DONAUBURG DANUBE-CASTLE	9825	8164	FALKENSTEINER GRUNER VELTLINER	80-12-2859		80-12-01		MI-1-436	3500
DUKATEN WEIN	9825	8164	WEISSER BURGUNDER WHITE WINE	80-12-2858		80-12-01		MI-1-436	3505
GUMPOLDSKIRCHNER	9825	8164	NEUBURGER SPATLESE AUSTRIA WHT	80-12-2861		80-12-01		MI-1-436	3506
LUMPENTURL	9825	8164	NEUBURGER AUSTRIA WHITE WINE	80-12-2860		80-12-01		MI-1-436	3503
MUSKAT OTTONEL	9825	8164	RADENER WHITE WINE	80-12-2856		80-12-01		MI-1-436	3504
SAUMUSSEL	9825	8164	GRUNER VELTLINER	80-12-2855		80-12-01		MI-1-436	3501
SCHLOSSKOGL	9825	8164	MANNERSDORF BUCHUSBERG RHNRSLN	80-12-2857		80-12-01		MI-1-436	3502
KLOSTERHOF	4756	8164	WHITE TABLE WINE 1979	80-12-2158		80-12-02		4-1-133	6014
KLOSTERHOF	4756	8164	WHITE TABLE WINE 1979	80-12-2156		80-12-02		4-1-133	6016
KLOSTERHOF	4756	8164	WHITE TABLE WINE 1979	80-12-2157		80-12-02		4-1-133	6015
KLOSTERHOF	4756	8164	WHITE TABLE WINE 1979	80-12-2154		80-12-02		4-1-133	6018
KLOSTERHOF	4756	8164	WHITE TABLE WINE 1979	80-12-2155		80-12-02		4-1-133	6017
FALKENSTEINER	6784	8164	FINE WHITE WINE	80-12-2402		80-12-05		FL-1-629	80-017
ST. MARTINSKIRCHE	6784	8164	FINE WHITE WINE SPATLESE	80-12-2405		80-12-05		FL-1-629	80-011
ST. MARTINSKIRCHE	6784	8164	FINE WHITE WINE SPATLESE	80-12-2406		80-12-05		FL-1-629	80-010
ST. MARTINSKIRCHE	6784	8164	FINE WHITE WINE AUSLESE	80-12-2404		80-12-05		FL-1-629	80-012
ZIERFANDLER	6784	8164	FINE WHITE WINE	80-12-2403		80-12-05		FL-1-629	80-016
FRAUENKIRCHNER KAISERGART	3642	8164	GEWURZTRAMINER TROCKEN	80-12-1981		80-12-17		MA-1-141	WWW-1298-A
WEIZEN	3642	8164	WELSCHRIESLING WHITE WINE	80-12-1982		80-12-17		MA-1-141	WWW-1298-E
STEINFEDER	3642	8164	MULLER-THURGAU WHITE WINE	80-12-1983	T81-02-27	80-12-17		MA-1-141	WWW-10229-F

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AUSTRIA	5423	8164	WHITE WINE	80-12-2294		80-12-19		ILL-I-419	MI-693
GUMPOLDSKIRCHNER	5423	8164	WHITE WINE	80-12-2293		80-12-19		ILL-I-419	MI-695
SAUBUSSEL	5423	8164	WHITE WINE	80-12-2292		80-12-19		ILL-I-419	MI-694
KLOSTERKELLER SIEGENDORF	3966	8164	WHITE WINE	81-01-1874		81-01-15		NY-I-575	40
BURGENLAND	0063	8164	SCHLOSSADLER 79	81-01-1692		81-01-19		CA-I-1081	JH-81-3
SAUBUSSEL	0063	8164	WHITE WINE	81-01-1695		81-01-19		CA-I-1081	WH-81-1
SCHLOSSADLER	0063	8164	WHITE GRAPE WINE 1979	81-01-1693		81-01-19		CA-I-1081	JH-81-4
SCHLOSSADLER	0063	8164	WHITE GRAPE WINE 1979	81-01-1694		81-01-19		CA-I-1091	JH-81-5
SCHLOSSADLER	0063	8164	WHITE GRAPE WINE 1979	81-01-1696		81-01-19		CA-I-1081	JH-81-2
ST. MARGARETHNER KAISERGARTEN	3642	8164	1979 WELSCHRIESLING, MULLER-TH	81-01-2148		81-01-19		MASS L-141	WWW-1298-D
RUSTER SONNENBERG	3642	8164	1979 GEWURZTRAMINER, PINOT BLA	81-01-2147		81-01-23		MASS-141	WWW-1298-F
POSSNITZBERGER ROMERSTEIN MUL	1627	8164	WHITE TABLE WINE	81-01-1970		81-01-27		CA-I-898	380
POSSNITZBERGER ROMERSTEIN TRAM	1627	8164	WHITE TABLE WINE	81-01-1968		81-01-27		CA-I-898	383
POSSNITZBERGER ROMERSTEIN WELS	1627	8164	WHITE TABLE WINE	81-01-1969		81-01-27		CA-I-898	382
BRUDER GRILL MYLORD	1627	8164	MEDIUM DRY WHITE WINE	81-02-2027		81-02-02		CA-I-898	387
CASTLE OF SCHONBRUNN PRODF. GR	1627	8164	MUSKAT OTTONEL WHITE WINE	81-02-2026		81-02-02		CA-I-898	385
VIENNA WALTZDREAM GRUNER VELTL	1627	8164	SELECTED AUSTRIAN WHITE WINE	81-02-2025		81-02-02		CA-I-898	384
AUSTRIAN PINOT	7231	8164	WHITE WINE	81-02-2868		81-02-02		CA-I-1556	AA 13
GRUNVELTLINER	7231	8164	WHITE WINE	81-02-2869		81-02-02		CA-I-1556	AA12
JAKOB DENNER	6809	8164	1979 BURGENLAENDER SPAETLESE	81-02-2829		81-02-07		ILL-I-445	9093
ALTENBERG RIESLING	9622	8164	WHITE WINE RSLNG	81-02-3298		81-02-12		IL-I-596	CH-79-003
GUMPOLDSKIRCHNER ROTGIPFLER	9622	8164	WHITE WINE	81-02-3300		81-02-12		IL-I-596	CH-79-004
RETZER ALTENBERG	9622	8164	WHITE WINE	81-02-3301		81-02-12		IL-I-596	CH-79-001
RUSTER ALTENBERG	9622	8164	WHITE WINE	81-02-3299		81-02-12		IL-I-596	CH-79-002
QUALITATSWEIN BESONDERER REIFE	3672	8164	76 DONNERSKIRCHNER SONNENBERG	81-02-2399		81-02-27		CHI-I-53	563
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2917		81-02-27		MD-I-242	1731
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2910		81-02-27		MD-I-242	1732
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2918		81-02-27		MD-I-242	1723
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2915		81-02-27		MD-I-242	1722
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2913		81-02-27		MD-I-242	1735
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2914		81-02-27		MD-I-242	1736
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2908		81-02-27		MD-I-242	1729
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2916		81-02-27		MD-I-242	1728
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2912		81-02-27		MD-I-242	1734
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2906		81-02-27		MD-I-242	1726
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2909		81-02-27		MD-I-242	1730
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2907		81-02-27		MD-I-242	1727
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2905		81-02-27		MD-I-242	1725
KLOSTERKELLER SIEGENDORF	7364	8164	WHITE WINE	81-02-2911		81-02-27		MD-I-242	1733
KREMSER PULVERTURM	8683	8164	WHITE QUALITY WINE	81-03-3541		81-03-02		NY-I-449	171
KREMSER RHEINRIESLING	8680	8164	WHITE QUALITY WINE	81-03-3540		81-03-02		NY-I-449	170
STURGKISCHES WEINGUT	8580	8164	WHITE QUALITY WINE	81-03-3542		81-03-02		NY-I-449	173
GUMPOLDSKIRCHNER	1932	8164	WHITE TABLE WINE	81-03-2164		81-03-05		9-I-254	81-37
SCHLOSSWEIN	1932	8164	1979 WHITE TABLE WINE	81-03-2165		81-03-05		9-I-254	81-38
TROCKENBEERENAUSLESE	1932	8164	WHITE TABLE WINE	81-03-2166		81-03-05		9-I-254	2/25/81
KLOSTERKELLER SIEGENDORF	2421	8164	TROCKENBEERENAUSLESE	81-03-2271		81-03-05		NJ-I-412	0016
KLOSTERKELLER SIEGENDORF	2421	8164	SCHLOSSWEIN WHITE WINE	81-03-2273	T81-06-06	81-03-05		NJ-I-412	0013
KLOSTERKELLER SIEGENDORF	2421	8164	WHITE WINE RIESLING KABINETT	81-03-2272	T81-06-06	81-03-05		NJ-I-412	0014
KLOSTERKELLER SIEGENDORF	2421	8164	SCHLOSSWEIN WHITE WINE 1979	81-03-2275	T81-06-06	81-03-05		NJ-I-412	0011
KLOSTERKELLER SIEGENDORF	2421	8164	PINOT BLANC WHITE WINE 1979	81-03-2274	T81-06-06	81-03-05		NJ-I-412	0012
KLOSTERKELLER SIEGENDORF	2421	8164	1979 RIESLING WHITE WINE KABIN	81-03-2276	T81-06-06	81-03-05		NJ-I-412	0010
KLOSTERKELLER SIEGENDORF	6234	8164	WHITE WINE	81-03-2897		81-03-05		MASS-I-122	22781
KLOSTERKELLER SIEGENDORF	6234	8164	WHITE WINE RIESLING KABINETT	81-03-2895		81-03-05		MASS-I-122	22381
KLOSTERKELLER SIEGENDORF	6234	8164	WHITE WINE AUSTRIAN	81-03-2893		81-03-05		MASS-I-122	22281
KLOSTERKELLER SIEGENDORF	6234	8164	RUSTER EISWEIN	81-03-2896		81-03-05		MASS-I-122	22681

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KLOSTERKELLER SIEGENDORF	6234	8164	AUSTRIAN PINOT BLANC	81-03-2894		81-03-05		MASS-I-122	21981
KLOSTERKELLER SIEGENDORF	6234	8164	WHITE WINE AUSTRIAN	81-03-2892		81-03-05		MASS-I-122	22081
REICHSGRAF VON INGELHEIM	7135	8164	79 GOLSER KAISERGARTEN BEERENA	81-03-3127		81-03-06		ILL-I-446	WT-A-0027
REICHSGRAF VON INGELHEIM	7135	8164	1980 TRAUSDORFER SPATLESE	81-03-3129		81-03-06		ILL-I-446	WT-A-0028
REICHSGRAF VON INGELHEIM	7135	8164	1980 MATZNER MUGEL WHTE GRP WI	81-03-3128		81-03-06		ILL-I-446	WT-A-0029
KLOSTERKELLER SIEGENDORF	4660	8164	GUMPOLDSKIRCHNER KAB. WHITE WI	81-03-2712		81-03-13		MA-I-321	3481-1
KLOSTERKELLER SIEGENDORF	4660	8164	GEWURZTRAMINER KABINETT	81-03-2711		81-03-13		MN-I-321	2481-2
KLOSTERKELLER SIEGENDORF	4660	8164	GRUNVELTLINER SPATLESE	81-03-2710		81-03-13		MA-I-321	3481-3
KLOSTERKELLER SIEGENDORF	4660	8164	BLAUFRANKISCH RED WINE	81-03-2708		81-03-13		MN-I-321	3481-5
KLOSTERKELLER SIEGENDORF	4660	8164	AUSTRIAN PINOT NOIR RED WINE	81-03-2709		81-03-13		MN-I-321	3481-4
KLOSTERKELLER SIEGENDORF	6234	8164	IMPERIAL DRY AUSTRIAN SEKT	81-03-2898		81-03-13		BOS-P-18	3481
BADENER	9825	8164	MUSKAT OTTONAL WHITE WINE	81-03-3896		81-03-13		MI-I-436	3509
WEINGUT BRUNDLMAYER	3960	8164	RIESLING SYLVANER BEERENAUSLES	81-03-2612		81-03-17		I-1001	H-W-208
WEINGUT BRUNDLMAYER	3960	8164	TROCKENBEERENAUSLESE	81-03-2610		81-03-17		I-1001	H-W-236
WEINGUT BRUNDLMAYER	3960	8164	WEISSER BURGUNDER BEERENAUSLES	81-03-2615		81-03-17		I-1001	H-W-207
WEINGUT BRUNDLMAYER	3960	8164	RIESLING SYLVANER BEERENAUSLES	81-03-2613		81-03-17		I-1001	H-W-209
WEINGUT BRUNDLMAYER	3960	8164	RIESLING KABINETT	81-03-2611		81-03-17		I-1001	H-W-210
WEINGUT BRUNDLMAYER	3960	8164	WEISSER BURGUNDER BEERENAUSLES	81-03-2614		81-03-17		I-1001	H-W-211
SCHMITT SOHNE	8474	8164	80 FRAUENKIRCHENER KAISERGARTE	81-03-3433		81-03-17		GA-I-363	0295
SCHMITT SOHNE	8474	8164	79 GUMPOLDSKIRCHENER WHT TBL W	81-03-3431		81-03-17		GA-I-363	0297
SCHMITT SOHNE	8474	8164	78 MONCHHOFER SPTL WHT TBL WIN	81-03-3432		81-03-17		GA-I-363	0296
SCHMITT SOHNE	8474	8164	80 FALKENSTEINER GRUNER VELTLI	81-03-3434		81-03-17		GA-I-363	0294
FERDINAND PIEROTH	7135	8164	1980 ST. ANDRAER SPATLESE	81-03-3126		81-03-23		ILL-I-446	PI-A-0403
FERDINAND PIEROTH	7135	8164	1980 ILLMITZER KAISERGARTEN	81-03-3122		81-03-26		ILL-I-446	PI-A-0399
GRINZINGER-NUSSBERGER	8683	8164	1978 WHITE WINE	81-03-3539		81-03-27		NY-I-449	175
JACOB GERHARDT	3422	8164	1979 WHITE STILL WINE	81-03-2389		81-03-30		ILL-I-415	640
PIEROTH	7135	8164	80 GAU-ALGESHEIMER ABTEY KABIN	81-04-3152		81-04-02		IL-I-446	PI G 0407
BEETHOVENWEIN	8683	8164	WHITE WINE	81-04-3520		81-04-07		NY-I-449	177
AUSTRIAN PINOT BLANC	3856	8164	WHITE WINE	81-04-2523		81-04-08		C-I-327	H-770-6
GEWURZTAMINER	3856	8164	WHITE WINE	81-04-2525		81-04-08		O-I-327	H-768-6
GEWURZTAMINER	3856	8164	WHITE WINE	81-04-2526		81-04-08		O-I-327	H-767-6
GRUNVELTLINER	3856	8164	WHITE WINE	81-04-2522		81-04-08		O-I-327	H-772-6
GUMPOLDSKIRCHNER	3856	8164	WHITE WINE	81-04-2524		81-04-08		O-I-327	H-769-6
KLOSTERKELLER SIEGENDORF	3856	8164	WHITE WINE	81-04-2527		81-04-08		O-I-327	H-766-6
TROCKENBEERENAUSLESE	3856	8164	WHITE WINE	81-04-2521		81-04-08		O-I-327	H-773-6
BLUMENGARTEN	1782	8164	LIGHT WINE	81-04-2116		81-04-09		FL-I-513	GW-457
FALKENSTEINER WELSCHRIESLIN	1782	8164	LIGHT WINE	81-04-2119		81-04-09		FL-I-513	GW-454
LIEBESSTEINER	1782	8164	KABINETT LIGHT WINE	81-04-2117		81-04-09		FL-I-513	GW-456
OSTERREICH	1782	8164	LIGHT WINE	81-04-2122		81-04-09		FL-I-513	GW-451
RUST NEUSIEDLERSEE	1782	8164	LIGHT WINE	81-04-2121		81-04-09		FL-I-513	GW-452
RUST NEUSIEDLERSEE	1782	8164	LIGHT WINE	81-04-2120		81-04-09		FL-I-513	GW-453
WERNERLAY	1782	8164	LIGHT WINE	81-04-2123		81-04-09		FL-I-513	GW-450
WERNERLAY	1782	8164	LIGHT WINE	81-04-2118		81-04-09		FL-I-513	GW-455
REICHSGRAF VON INGELHEIM	7135	8164	79 OGGAUER GOLDTREPPE BEERENAU	81-04-3153		81-04-09		IL-I-446	WT A 3030
SCHMITT SOHNE	8474	8164	1980 GERMAN WINE	81-04-3442		81-04-09		GA-I-363	0293
SCHMITT SOHNE	8474	8164	STILL WHITE TABLE WINE	81-04-3441		81-04-10		GA-I-363	0298
OSBERGER	4756	8164	KAISERGOLD TROCKENBEERENAUSLES	81-04-2747		81-04-15		4-I-133	6020
OSBERGER	4756	8164	KAISERGOLD AUSLESE WH TBL WINE	81-04-2748		81-04-15		4-I-133	6021
OSBERGER	4756	8164	KAISERGOLD EISWEIN WH TB WINE	81-04-2746		81-04-15		4-I-133	6019
PIEROTH	7135	8164	79 FELSEN SCHILLINGSBERG TROCK	81-04-3150		81-04-15		IL-I-446	PI A 0406
PIEROTH	7135	8164	79 HALBTURNER [illegible] AUSLE	81-04-3151		81-04-15		IL-I-446	PI A 0405
KREMSER KOGL	1590	8164	WHITE STILL WINE	81-04-2061		81-04-16		I-549	A-153
KREMSER WACHTBERG	1590	8164	WHITE STILL WINE	81-04-2062		81-04-16		I-549	A-152
KREMSER WEISSER BURGUNDER	1590	8164	PINOT BLANC	81-04-2060		81-04-16		I-549	A-154
UNDHOF WIEDEN	1590	8164	KABINETT	81-04-2059		81-04-16		I-549	A-155

BRAND NAME	VEND	C/T CODE	CLASS/TYPE (C/T) DESCRIPTION	DOCUMENT SERIAL NBR	CANCEL OR TEMP DATE	DATE OF APPROVAL FORM	PLANT OR PERMIT NBR	APPLICANT SERIAL NBR
OSBERGER	4756	8164	KAISERGOLD BEERENAUSLESE 1979	81-04-2745		81-04-16	4-I-133	6022
OSTERREICH	8680	8164	PINOT BLANC WHITE WINE	81-04-3521		81-04-23	NY-I-449	190
GUMPOLDS KIRCHNER	4680	8164	WHITE QUALITY WINE	81-04-3523		81-04-23	NY-I-449	193
GUMPOLDS KIRCHNER	8680	8164	PINOT BLANC WHITE WINE	81-04-3524		81-04-23	NY-I-449	181
NEUSIEDLER	8680	8164	WHITE TABLE WINE	81-04-3522		81-04-23	NY-I-449	172
WINZERGENOSSENSCHAFT WOERT SOU	0115	8164	GOLDEN DUKATEN WHITE TABLE WIN	81-05-1470		81-05-05	OHIO-I-370	5570
TOLLEYS	0497	8164	H.D. MONASTERY WHITE WINE	81-05-1697		81-05-06	CA-I-2179	1007
PRINZ VON LEISSER	5729	8164	BEERENAUSLESE WHITE WINE	81-05-3077		81-05-06	TX-I-462	8
PRINZ VON LEISSER	5729	8164	DRY WHITE TRES WINE	81-05-3076		81-05-06	TX-I-462	10
PRINZ VON LEISSER	5729	8164	GRUNER VELTLINER AUSLESE	81-05-3078		81-05-06	TX-I-462	7
PRINZ VON LEISSER	5729	8164	WHITE TABLE WINE	81-05-3074		81-05-06	TX-I-462	12
PRINZ VON LEISSER	5729	8164	GRUNER VELTLINER SPATLESE	81-05-3079		81-05-06	TX-I-462	6
PRINZ VON LEISSER	5729	8164	1978 EISWEIR WHITE WINE	81-05-3075		81-05-06	TX-I-462	11
ST MARTINUS-LUTHERWEIN	5729	8164	AUSTRIA WINE	81-05-3073		81-05-06	TX-I-462	4
FALKENSTEINER	1756	8164	AUSTRIAN WHITE WINE	81-05-2617		81-05-07	S-I-83	985
REICHSGRAF VON INGELHEIM	7135	8164	OGGAUER GOLDTREPPE BEERENAUSLE	81-05-3387		81-05-07	IL-I-446	WI-A-2234
BURG SENFTENBERG	1737	8164	WHITE WINE	81-05-1773		81-05-12	WIS-I-285	48139
SCHLOSS GRAFENEGG	1737	8164	WHITE TABLE WINE 1979	81-05-1771		81-05-12	WIS-I-285	48142
SCHLOSS GRAFENEGG	1737	8164	WHITE WINE 1977	81-05-1772		81-05-12	WIS-I-285	48140
SCHLOSS GRAFENEGG	1737	8164	WHITE WINE 1980	81-05-1770		81-05-12	WIS-I-285	48141
SCHLOSS MAISSAU	1737	8164	WHITE TABLE WINE	81-05-1774		81-05-12	WIS-I-285	48138
SCHLOSS RIEGERSBURG	1737	8164	WHITE TABLE WINE	81-05-1775		81-05-12	WIS-I-285	48135
THE GOLDEN CHAPEL	1515	8164	1980 ST GEORGENER SPATLESE	81-05-1840		81-05-15	NY-I-581	1857
THE GOLDEN CHAPEL	1515	8164	1980 FRAUENKIRCHNER AUSLESE	81-05-1841		81-05-15	NY-I-581	1856
THE GOLDEN CHAPEL	1515	8164	1980 FRAUENKIRCHNER	81-05-1842		81-05-15	NY-I-581	1855
THE GOLDEN CHAPEL	1515	8164	1980 RUSTER AUSLESE	81-05-1843		81-05-15	NY-I-581	1854
ALTES WEINHAUS	1574	8164	1980 ST. GEORGENER SPATLESE	81-05-1860		81-05-15	OH-I-572	2052
ALTES WEINHAUS	1574	8164	1980 FALKENSTEINER	81-05-1861		81-05-15	OH-I-572	2053
BURGENLAND	8144	8164	WHITE WINE	81-05-3587		81-05-15	ILL-I-370	107
KLOSTERKELLER SIEGENDORF	9446	8164	TROCKENBEERENAUSLESE WH W 76	81-05-3940		81-05-15	WA-I-889	138
KLOSTERKELLER SIEGENDORF	9446	8164	AUSTRIAN PINOT BLANC KB 1976	81-05-3939		81-05-15	WA-I-889	140
PRINZ VON LEISSER	5729	8164	WHITE TABLE WINE	81-05-3070		81-05-18	TX-I-462	16
PRINZ VON LEISSER	5729	8164	DRY WHITE TABLE WINE	81-05-3072		81-05-18	TX-I-462	13
PRINZ VON LEISSER	5729	8164	WHITE TABLE WINE	81-05-3071		81-05-18	TX-I-462	15
PRINZ VON LEISSER	5729	8164	WHITE TABLE WINE	81-05-3068		81-05-18	TX-I-462	19
PRINZ VON LEISSER	5729	8164	WHITE TABLE WINE	81-05-3069		81-05-18	TX-I-462	19
BRUDER GRILL	2621	8164	FELSENKONIG SWEET WHITE WINE	81-05-2213		81-05-20	GA-I-391	0812
BRUDER GRILL	2621	8164	GUMPOLDSKIRCHNER WHITE WINE 79	81-05-2216		81-05-20	GA-I-391	0816
BRUDER GRILL	2621	8164	MYLORD WHITE TABLE WINE 1979	81-05-2215		81-05-20	GA-I-391	0814
BRUDER GRILL	2621	8164	SCHWARZE KATZ WHITE WINE 1979	81-05-2211		81-05-20	GA-I-391	08113
BRUDER GRILL	2621	8164	CASTLE OF SCHONBRUNN WHITE WIN	81-05-2221		81-05-20	GA-I-391	0815
BRUDER GRILL	2621	8164	SOUND OF DANUBE 1979	81-05-2218		81-05-20	GA-I-391	0818
BRUDER GRILL	2621	8164	WINZERKONIG SPATLESE 1979	81-05-2217		81-05-20	GA-I-391	0817
BRUDER GRILL	2621	8164	FELSENKONIG SWEET WHITE WINE	81-05-2212		81-05-20	GA-I-391	0811
BRUDER GRILL	2621	8164	PRETTY GIRL WHITE WINE 1979	81-05-2219		81-05-20	GA-I-391	0819
BRUDER GRILL	2621	8164	RIESLING WHITE WINE 1979	81-05-2220		81-05-20	GA-I-391	08110
VIENNA WALTZDREAM	2621	8164	WHITE TABLE WINE 1979	81-05-2214		81-05-20	GA-I-391	0813
KLOSTERKELLEREI	6009	8164	GUMPOLDSKIRCHNER SPAETLESE WHI	81-05-3287		81-05-20	ILL-I-445	9132-3
DURNSTEINER KATZENSPRUNG	0219	8164	WHITE TABLE WINE 1978	81-05-1540		81-05-28	TEX-I-249	1-1432
GUMPOLDSKIRCHNER	4981	8164	WHITE AUSTRIAN WINE	81-05-2918	T81-01-29	81-05-29	MO-I-315	RO-4
GUMPOLDSKIRCHNER	4980	8164	AUSTRIAN WINE	81-05-2919	T81-08-25	81-05-29	MO-I-315	RO-3
KAISER PROBUS	4980	8164	WHITE AUSTRIAN WINE	81-05-2917		81-05-29	MO-I-315	RO-5
KREMSER SANDGRUBE	4980	8164	WHITE WINE	81-05-2916		81-05-29	MO-I-315	RO-1
VIENNA	4980	8164	WHITE WINE	81-05-2915		81-05-29	MO-I-315	RO-2
SCHLOSS GRAFENEGG	9609	8164	MULLER THURGAU WHITE W 1978	81-06-4263		81-06-03	SF-I-654	W-201 P01286

DATE PREPARED: 09 30 86

BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS
CERTIFICATE OF LABEL APPROVAL (COLA) SYSTEM

BRAND NAME	VEND	C/T CODE	CLASS/TYPE (C/T) DESCRIPTION	DOCUMENT SERIAL NBR	CANCEL OR TEMP DATE	DATE OF APPROVAL	FORM	PLANT OR PERMIT NBR	APPLICANT SERIAL NBR
SCHLOSS GRAFENEGG	9609	8164	STRASSER BEERENAUSLESE 1976	81-06-4265		81-06-03		SF-1-654	S-316 PO1286
SCHLOSS GRAFENEGG	9609	8164	GRUNER VELTLINER WHITE W 79	81-06-4262		81-06-03		SF-1-654	G-100 PO1286
SCHLOSS GRAFENEGG	9609	8164	RHEINRIESLING WHITE WINE 1980	81-06-4264		81-06-03		SF-1-654	R-89 PO1286
BRUDER GRILL	2621	8164	SWEET WHITE WINE	81-06-2298		81-06-04		GA-1-391	08116
THERESIENFELDER	1627	8164	WHITE AUSTRIAN QUALITY WINE	81-06-2018		81-06-05		CA-1-898	399
W. GUMPOLDSKIRCHEN	5781	8164	SPATLESE WHITE TABLE WINE	81-06-3052		81-06-10		CHI-1-68	1011
FREIGUT THALLERN	0430	8164	GUMPOLDSKIRCHNER WHT TBL WN	81-06-1641		81-06-11		FL-1-635	3477
FREIGUT THALLERN	0430	8164	GUMPOLDSKIRCHNER WHT T W 79	81-06-1642		81-06-11		FL-1-635	3377
GRUENER VELTLINER	0430	8164	RIEDE SCHWEB WHT TB WN 1979	81-06-1638		81-06-11		FL-1-635	3177
STIFT MELK	0430	8164	GUMPOLDSKIRCHNER SPA TBL WN	81-06-1640		81-06-11		FL-1-635	3677
STIFT MELK	0430	8164	GUMPOLDSKIRCHNER TABLE WINE	81-06-1639		81-06-11		FL-1-635	3577
GRUNER VELTLINER	0219	8164	MALTESER WHITE WINE	81-06-1621		81-06-17		TEX-1-249	1-1474
LENZ MOSER	0219	8164	RHEINRIESLING WHITE WINE 1978	81-06-1618		81-06-17		TEX-1-249	1-1470
LENZ MOSER	0219	8164	TROCKENBEERENAUSLESE 1976	81-06-1620		81-06-17		TEX-1-249	1-1473
LENZ MOSER	0219	8164	MUSKAT-OTTONEL SPAT 1977	81-06-1622		81-06-17		TEX-1-249	1-1472
LENZ MOSER	0219	8164	BEERENAUSLESE WHITE WINE 1976	81-06-1619		81-06-17		TEX-1-249	1-1471
ALTES WEINHAUS	1574	8164	FALKENSTEINER AUSTRIAN WINE	81-06-2004		81-06-17		OH-1-572	2057
ALTES WEINHAUS	1574	8164	ST GEORGENER SPATLESE	81-06-2002		81-06-17		OH-1-572	2056
ALTES WEINHAUS	1574	8164	'T MARGARETHENER KABINETT'	81-06-2003		81-06-17		OH-1-572	2058
ALTES WEINHAUS	1574	8164	RUSTER AUSLESE 1980	81-06-2001		81-06-17		OH-1-572	2055
SCHLOSS GRAFENEGG	5423	8164	WHITE 78 MULLER THURGAU WINE	81-06-3022		81-06-19		ILL-1-419	MI-749
SCHLOSS GRAFENEGG	5423	8164	WHITE WINE 1980 RHEINRIESLING	81-06-3020		81-06-19		ILL-1-419	MI-751
SCHLOSS GRAFENEGG	5423	8164	1977 STRASSER AUSLESE WHITE WI	81-06-3023		81-06-19		ILL-1-419	MI-748
SCHLOSS GRAFENEGG	5423	8164	WHITE WINE 1979 GRUNNER VELTLI	81-06-3021		81-06-19		ILL-1-419	MI-750
SCHLOSS GRAFENEGG	5423	8164	WHITE 1976 STRASSER BEERENAUSL	81-06-3019		81-06-19		ILL-1-419	MI-752
STIFTSKELLERAMT GOTTWEIG	4980	8164	ST. STEPHANS WINE 1980	81-06-2832B		81-06-27		MO-1-315	RO-109
THE GOLDEN CHAPEL	1515	8164	1980 RUSTER AUSLESE WHT WN	81-06-1972		81-06-29		NY-1-581	1890
THE GOLDEN CHAPEL	1515	8164	1980 ST GEORGENER SPATLESE	81-06-1973		81-06-29		NY-1-581	1891
THE GOLDEN CHAPEL	1515	8164	1980 FALKENSTEINER WHT WINE	81-06-1971		81-06-29		NY-1-581	1889
WEINGUT JULIUS HAFNER	7229	8164	AUSTRIAN WHITE WINE	81-07-3236		81-07-01		CA-1-2241	JH/130
RIED KLAUS	3966	8164	RIESLING TABLE WINE	81-07-1961		81-07-09		NY-1-575	JJ-1
KLOSTERKELLER SIEGENDORF	2421	8164	WHITE TABLE WINE GEWURZTRAMINER	81-07-2292		81-07-09		NJ.1-412	0049
KLOSTERKELLER SIEGENDORF	2431	8164	JOHANNISBERG RIESLING	81-07-2296		81-07-09		NY-1-840	0046
WEINKELLEREI	1756	8164	AUSTRIAN WHITE WINE 1980	81-07-2502		81-07-15		S-1-83	1010
WEINKELLEREI	1756	8164	AUSTRIAN WHITE WINE	81-07-2501		81-07-15		S-1-83	1008
WEINKELLEREI	1756	8164	ST. GEORGENER SPATLESE	81-07-2500		81-07-15		S-1-83	1007
KLOSTERKELLER SIEGENDORF	2421	8164	WHITE TABLE WINE GEWURZTRAMINER	81-07-2290		81-07-23		NJ.1-412	0047
KLOSTERKELLER SIEGENDORF	2421	8164	WHITE TABLE WINE GEWURZTRAMINER	81-07-2291		81-07-23		NJ.1-412	0048
DR LUEGER	0219	8164	WHITE AUSTRIAN WINE	81-07-1748		81-07-24		TX-1-249	1-1536
PINOT BLANC	0219	8164	WHITE AUSTRIAN QUALITY WINE	81-07-1746		81-07-24		TX-1-249	1-1535
SCHLUMBERGER	0219	8164	SPARKLING EXTRA DRY WINE 1842	81-07-1749		81-07-24		TX-1-249	1-1537
TRAMER AUSLESE	0219	8164	WHITE AUSTRIAN WINE	81-07-1747		81-07-24		TX-1-249	1-1534
LEONARD KREUSCH	4756	8164	OSBERGER WHITE TBLS WINE	81-07-2682		81-07-27		6-1-133	6023
KENESEY	4598	8164	WHITE STILL WINE	81-07-2618		81-07-28		ILL-1-415	A013
KENESSEY	4598	8164	WHITE STILL WINE	81-07-2622		81-07-28		ILL-1-415	A016
KENESSEY	4598	8164	WHITE STILL WINE	81-07-2621		81-07-28		ILL-1-415	A014
KREMSER	4598	8164	KENESSEY ROSENGARTEN WHT	81-07-2619		81-07-28		ILL-1-415	A017
KREMSER	4598	8164	KREMSER GOLDBERG AUSLESE	81-07-2620		81-07-28		ILL-1-415	A015
KREMSER SANDGRUBE	0363	8164	WHITE QUALITY WINE	81-07-1633		81-07-29		CA-1-1091	WK-81-6
KREMSER ROTWEIN	4598	8164	RED STILL WINE	81-08-2394		81-08-03		ILL-1-415	A009
WALTHART WEINKELLEREI	2343	8164	OSTERREICH 1963 KLOSTERNEUBURG	81-08-2114		81-08-04		NJ-1-413	WH-330
WALTHART WEINKELLEREI	2343	8164	OSTERREICH GRUNER VELTLINER	81-08-2116		81-08-04		NJ-1-413	WH-331
WALTHART WEINKELLEREI	2343	8164	OSTERREICH 1942 KLOSTERNEUBURG	81-08-2115		81-08-04		NJ-1-413	WH-333
KENESSEY	4598	8164	KREMSER JOHANNESBERG RLNG	81-08-2392		81-08-04		ILL-1-415	A010
KREMSER WEISSBURGUNDER	4598	8164	KENESSEY PINOT BLANC	81-08-2393		81-08-04		ILL-1-415	A012

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GUMPOLDS KIRCHNER	4933	8164	SPATLESE WHITE WINE	81-08-2441		81-08-06		CO-I-234	120-81
GUMPOLDSKIRCHNER GEWURZTRAMIN	4933	8164	AUSTRIAN WHITE WINE	81-08-2440		81-08-06		CC-I-234	119-81
KREMER HEURIGER	4933	8164	AUSTRIAN RIESLING 1978	81-08-2445		81-08-06		CO-I-234	125-81
MONCHHOF BURGENLAND	4933	8164	1979 RUSTER TROCKENBEERENAUSLES	81-08-2443		81-08-06		CO-I-234	123-81
OSTERREICH	4933	8164	KREMSER SCHMIDT	81-08-2447		81-08-06		CC-I-234	127-81
OSTERREICH	4933	8164	KREMSER BEERENAUSLESE 1975	81-08-2446		81-08-06		CO-I-234	126-81
OSTERREICH	4933	8164	TOWER OF KREMS KREMSER PULVERT	81-08-2448		81-08-06		CC-I-234	128-81
RUSTER EISWEIN	4933	8164	WHITE QUALITY WINE	81-08-2442		81-08-06		CO-I-234	122-81
THERESIENFELDER	4933	8164	1977 TRAMINER-AUSLESE	81-08-2444		81-08-06		CO-I-234	124-81
JAKOB DEMMER	6809	8164	BURGENLAENDER SPAETLESE 1980	81-08-2806		81-08-06		ILL-I-445	9198/2
OSTERREICH	8144	8164	ST MARGARETHENER AUSLESE WN	81-08-3236		81-08-10		IL-I-370	142
RUSTER AUSLESE	8508	8164	WEISSBURGUNDER WHITE WINE	81-08-3254		81-08-10		NY-I-345	MO-3
RUSTER BEEREN	8508	8164	WEISSBURGUNDER WHITE WINE	81-08-3253		81-08-10		NY-I-345	MO-4
RUSTER SPATLESE	8508	8164	NEUBURGER WHITE WINE 1980	81-08-3256		81-08-10		NY-I-345	MO-2
RUSTER TROCKENBEEREN	8508	8164	AUSLESE WHITE WINE 1980	81-08-3255		81-08-10		NY-I-345	MO-1
TEM KNAPPSTEINS ENTERPRISE	7852	8164	FUME BLANC STILL WHT TBLS	81-08-3164		81-08-12		CA-I-1776	AUS-29
WINZERGENOSSENSCHAFT KREMS OST	0219	8164	KREMSER BEERENAUSLESE	81-08-1679		81-08-19		TX-I-249	I-1562
MONCHHOF BURGENLAND	4933	8164	76 RUSTER BEERENAUSLESE . .	81-08-2449		81-08-19		CO-I-234	121-81
TOLLEYS	0897	8164	OLD MONASTERY WHT WINE	81-08-1825		81-08-21		CA-I-2179	1007
WINZERGENOSSENSCHAFT KREMS.OST	0219	8164	HEURIGEN AUSTRIAN RSL 78 OSWUW	81-08-1678		81-08-31		TX-I-249	I-1966
JAKOB GERHARDT	1782	8164	OESTERREICH WHITE STILL WINE	81-09-1868		81-09-02		FL-I-513	GW-39
JAKOB GERHARDT	1782	8164	OESTERREICH WHITE STILL WINE	81-09-1869		81-09-02		FL-I-513	GW-02
JAKOB GERHARDT	3422	8164	WHITE STILL WINE	81-09-2119		81-09-03		ILL-I-415	G51
SCHLOSSADLER	8123	8164	MONCHHOFER LANGBERG AUSLESE	81-09-3068		81-09-11		CA-I-2282	4
SCHLOSSADLER	8123	8164	ILLMITZER FELSENACKER AUSLESE	81-09-3067		81-09-11		CA-I-2282	3
SCHLOSSADLER	8123	8164	EISWEIN WHITE GRAPE WINE	81-09-3069		81-09-11		CA-I-2282	6
SCHLOSSADLER	8123	8164	MONCHHOFER KAISERGARTEN KAB.	81-09-3065		81-09-11		CA-I-2282	1
SCHLOSSADLER	8123	8164	ILLMITZER FELSENACKER RLNG	81-09-3066		81-09-11		CA-I-2282	2
SCHLOSSADLER	8123	8164	MONCHHOFER KAISERGARTEN BEEREN	81-09-3064		81-09-11		CA-I-2282	5
KLOSTERKELLER SIEGENDORF	0615	8164	SOMMERHOF ROSE	81-09-1570		81-09-29		FL-I-572	BG1-573-44
OSTERREICH	4933	8164	KREMSER SPATLESE	81-09-2375		81-09-29		CC-I-234	128-81
KLOSTERKELLER SIEGENDORF	0354	8164	TROCKENBEERENAUS. WHT TBLS WIN	81-10-1545		81-10-01		TX-I-426	3926
KLOSTERKELLER SIEGENDORF	0354	8164	SOMMERHOF WHITE WINE	81-10-1546		81-10-01		TX-I-426	3925
KLOSTERKELLER SIEGENDORF	0354	8164	AUSTRIAN PINOT BLANC WHT WINE	81-10-1547		81-10-01		TX-I-426	3924
RUSTER BEERENAUSLESE	1743	8164	AUSTRIA WINE	81-10-1922		81-10-01		MO-I-351	BW5
ST GEORGENER WELSCHRIESLING	1743	8164	AUSTRIA WINE	81-10-1923		81-10-01		MO-I-351	BW2
FREIGUT THALLERN	0433	8164	WHITE TABLE WINE 1980	81-10-1672		81-10-02		FL-I-635	3777
GEWURZTRAMINER	1743	8164	AUSTRIA WINE	81-10-1921		81-10-02		MO-I-351	BW4
GRUENER STORCH	1743	8164	AUSTRIA WINE	81-10-1924		81-10-02		MO-I-351	BW1
WEISSER STORCH	1743	8164	AUSTRIA WINE	81-10-1919		81-10-02		MO-I-351	BW7
WELSCHRIESLING	1743	8164	AUSTRIA WINE	81-10-1920		81-10-02		MO-I-351	BW8
SCHWARZBERG GUMPOLDSKIRCHNE	2519	8164	KABINETT WHITE TABLE WINE	81-10-2189		81-10-02		CONN-I-164	H-34
[illegible]	2519	8164	DONAUSCNIE GRUNER VELTLINER	81-10-2190		81-10-02		CONN-I-164	H-35
KARL MEISTER	8360	8164	1981 ST.MARGARETHENER SPTL	81-10-3632		81-10-02		IL-I-552	9673
ALTES WEINHAUS	1574	8164	AUSTRIAN WHITE WINE	81-10-1882		81-10-14		OH-I-572	2080
GUMPOLDSKIRCHNER	0433	8164	WHITE TABLE WINE	81-10-1671		81-10-19		FL-I-635	4377
[illegible]	1743	8164	AUSTRIA WINE	81-10-1918		81-10-22		MC-I-351	BW7
A ZIMMERMANN	7521	8164	1979 RUSTER SPATLESE	81-10-3443		81-10-22		BPR-CU-1239	A-81-354
KLOSTERHOF	4756	8164	WHITE TABLE WINE	81-10-2726	T82-01-26	81-10-27		4-I-133	6026
KLOSTERHOF	4756	8164	WHITE TABLE WINE	81-10-2725	T82-01-26	81-10-27		4-I-133	6025
OSREGGER	4756	8164	WHITE TABLE WINE	81-10-2724		81-10-27		4-I-133	6327
THERESIENFELDER	5561	8164	WHITE AUSTRIAN QUALITY WINE 77	81-11-2242		81-11-03		ILL-I-415	A018
WEINGUT BRUNDLMAYER	3361	8164	LANGENLOISER SPIEGEL 1966	81-11-2143		81-11-04		I-1001	H-W-297
WEINGUT BRUNDLMAYER	3361	8164	LANGENLOISER KALKSTURE FS & 71	81-11-2142		81-11-04		I-1001	H-W-298
ALTES WEINHAUS	1574	8164	1980 RUSTER AUSLESE	81-11-1613		81-11-05		OH-I-572	2081

BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS
CERTIFICATE OF LABEL APPROVAL (COLA) SYSTEM

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KLOSTERKELLER SIEGENDORF	5056	8164	WHITE WINE RIESLING KABINETT	81-11-2122		81-11-25		C-1-327	H-879-6
KLOSTERKELLER SIEGENDORF	5056	8164	AUSTRIAN PINOT BLANC KABINETT	81-11-2123		81-11-25		C-1-327	H-877-6
[illegible]	4931	8164	1980 RHEINRIESLING WHITE WINE	81-11-2307		81-11-06		CO-1-234	131-81
SCHLOSS GRAFENEGG	4931	8164	1979 GRUNER VELTLINER	81-11-2305		81-11-26		CC-1-234	133-81
SCHLOSS MAISSAU	4931	8164	1980 MULLER THURGAU	81-11-2306		81-11-06		CO-1-234	132-81
OSTERREICH KREMSER	4703	8164	PINOT BLANC WHITE WINE	81-11-2390	T81-12-31	81-11-10		MD-1-315	RU-111
[illegible]	4493	8164	TRAMINER-AUSLESE	81-11-2391	T81-12-31	81-11-10		MD-1-315	RO-110
[illegible] SANDGRABEN	7135	8164	WHT ORA GRAPE WINE	81-12-2497		81-12-08		ILL-1-444	PI-A-3437
[illegible]	5756	8164	FRAUENKIRCHNER BEERENAUS 1979	81-12-2053		81-12-10		S-1-83	1037
[illegible]	5756	8164	ST. GEORGENER SPATLESE 1980	81-12-2052		81-12-10		S-1-83	1038
[illegible]	5756	8164	ST. MARGARETHENER KAB. 1983	81-12-2051		81-12-10		S-1-83	1039
[illegible]	5756	8164	AUSTER AUSLESE 1980	81-12-2050		81-12-10		S-1-83	1040
BURGENLANDISCHER WINZERVERBAND	4598	8164	GOLDENER STORCH WHITE WINE	81-12-2140		81-12-14		ILL-1-415	8081
GEWURZTRAMINER	6072	8164	AUSTRIAN WHITE WINE	81-12-2354		81-12-14		CA-1-1725	679C
GUMPOLDSKIRCHNER	6072	8164	AUSTRIAN WHITE WINE	81-12-2355		81-12-14		CA-1-1725	679C
FRAUENKIRCHNER	0054	8164	AUSTRIAN WHITE WINE 1979	81-12-1339		81-12-15		TX-1-426	4028
[illegible]	0054	8164	AUSTRIAN WHITE WINE 1980	81-12-1342		81-12-15		TX-1-426	4026
[illegible]	0054	8164	AUSTRIAN WHITE WINE 1980	81-12-1341		81-12-15		TX-1-426	4030
ST GEORGENER	0054	8164	AUSTRIAN WHITE WINE 1980	81-12-1340		81-12-15		TX-1-426	4029
KLOSTERKELLER SIEGENDORF	9446	8164	WEISSBURGUNDER KABINETT	81-12-2943		81-12-22		VT-1-123	143
KLOSTERKELLER SIEGENDORF	9446	8164	TROCKENBEERENAUSLESE RIESLING	81-12-2944		81-12-22		VT-1-123	145
STUDENT PRINCE	5000	8164	KRONPRINZ WHITE WINE	82-01-1617		82-01-13		2-P-2756	A-223
GRUNER VELTLINER	9419	8164	MALTESER QUALITY WINE	82-01-2114		82-01-13		VT-1-123	82007
RIEDE ANTLASBERG	9419	8164	GRUNER VELTLINER QUALITY WINE	82-01-2113		82-01-13		VT-1-123	82005
RIEDE ANTLASBERG	9419	8164	MULLER THURGAU QUALITY WINE	82-01-2112		82-01-13		VT-1-123	82004
RIEDE JAMMING	9419	8164	GEWURZTRAMINER SPATLESE	82-01-2115		82-01-13		VT-1-123	82006
KLOSTERKELLER SIEGENDORF	1932	8164	SCHLOSSWEIN WHITE WINE 1980	82-01-1104		82-01-22		S-1-254	82-2
KLOSTERKELLER SIEGENDORF	1932	8164	GRUNVELTLINER KABINETT WHITE W	82-01-1103		82-01-22		S-1-254	82-1
KLOSTERKELLER SIEGENDORF	1932	8164	AUSTRIAN PINOT BLANC WHT WINE	82-01-1105		82-01-22		S-1-254	82-4
KLOSTERKELLER SIEGENDORF	7304	8164	WHITE WINE RIESLING KABINETT	82-01-1707		82-01-25		MD-1-242	1779
KLOSTERKELLER SIEGENDORF	7304	8164	WHITE WINE GUMPOLDSKIRCHNER	82-01-1709		82-01-25		MD-1-242	1776
KLOSTERKELLER SIEGENDORF	7304	8164	WHITE WINE RIESLING KABINETT	82-01-1706		82-01-25		MD-1-242	1709
KLOSTERKELLER SIEGENDORF	7304	8164	AUSTRIAN PINOT BLANC	82-01-1705		82-01-25		MD-1-242	1782
KLOSTERKELLER SIEGENDORF	7304	8164	WHITE WINE GUMPOLDSKIRCHNER	82-01-1708		82-01-25		MD-1-242	1778
KLOSTERKELLER SIEGENDORF	0054	8164	SONNENHOF WHITE WINE	82-01-0991		82-01-27		TX-1-426	5025
KLOSTERKELLER SIEGENDORF	0054	8164	SONNENHOF WHITE WINE	82-01-0988		82-01-27		TX-1-426	5035
KLOSTERKELLER SIEGENDORF	0054	8164	RIESLING KABINETT WHITE E WINE	82-01-0989		82-01-27		TX-1-426	5044
KLOSTERKELLER SIEGENDORF	0054	8164	AUSTRIAN PINOT BLANC	82-01-0990		82-01-27		TX-1-426	5026
GRUNER VELTLINER	6717	8164	WHITE TABLE WINE	82-01-1458		82-01-28		FL-1-716	82-902
RIESLING	6717	8164	WHITE TABLE WINE	82-01-1460		82-01-28		FL-1-716	82-901
[illegible]	6717	8164	WHITE TABLE WINE	82-01-1459		82-01-28		FL-1-716	82-005
[illegible]	7135	8164	WHITE GRAPE WINE	82-02-1070		82-02-04		IL-1-444	NM G 3320
[illegible] BEERENAUSLESE	7135	8164	WHITE GRAPE WINE	82-02-1069		82-02-04		IL-1-444	NM A 3321
WALTHARI WEINKELLEREI	2343	8164	NUSSDORFER GRUNER VELTLINER	82-02-1400		82-02-11		NJ-1-413	AU-613
WALTHARI WEINKELLEREI	2343	8164	KLOSTERNEUBURGER GRUNER VELTLI	82-02-1407		82-02-11		NJ-1-413	AU-611
KLOSTERKELLER SIEGENDORF	0054	8164	WHITE WINE RIESLING KABINETT	82-02-1115		82-02-22		TX-1-426	6307
KLOSTERKELLER SIEGENDORF	0054	8164	AUSTRIAN PINOT BLANC	82-02-1116		82-02-22		TX-1-426	6008
KLOSTERKELLER SIEGENDORF	0054	8164	AUSTER EISWEIN [illegible] AUSLESE	82-02-1113		82-02-22		TX-1-426	6306
KLOSTERKELLER SIEGENDORF	0054	8164	GEWURZTRAMINER KABNT	82-02-1114		82-02-23		TX-1-426	6035
[illegible] HOLLENPLAN	7135	8164	WHITE GRAPE WINE	82-02-1068		82-02-25		IL-1-444	WT A 3339
[illegible]	7135	8164	WHITE GRAPE WINE	82-02-1066		82-02-25		IL-1-444	PI A 3445
[illegible]	7135	8164	WHITE GRAPE WINE	82-02-1067		82-02-25		IL-1-444	PI A 3446
GRUNVELTLINER	9636	8164	WHITE TABLE WINE	82-03-4017		82-03-11		WA-1-889	140
SCHLOSSADLER	8171	8164	NEUSIEDLER [illegible] KAB 1981	82-03-1609		82-03-11		CA-1-2202	11
SCHLOSSADLER	8171	8164	MONCHHOFER [illegible] KAB 82	82-03-1608		82-03-11		CA-1-2202	12

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SCHLOSSANGER	4173	0164	RUSTER ST. PETERSBERG SPAT 80	82-03-1607		82-03-11		CA-I-2282	10
GUMPOLDSKIRCHEN	3631	0164	WHITE QUALITY WINE	82-03-1776		82-03-12		FL-I-635	6277
[illegible]	0630	0164	WHITE QUALITY WINE	82-03-1774		82-03-12		FL-I-635	5677
KLOSTERKELLER SIEGENDORF	2366	0164	WHITE WINE	82-03-1925		82-03-18		NY-I-575	KS-2
WINZERGENOSSENSCHAFT KREMS	0693	0164	WHITE AUSTRIAN WINE 1976	82-03-3702		82-03-19		NY-I-449	227
GRUNER VELTLINER	0630	0164	WHITE QUALITY WINE	82-03-1775		82-03-25		FL-I-635	6377
KLOSTERNEUBURGER [illegible]	1672	0164	AUSTRIAN WHITE WINE	82-03-2065		82-03-25		IL-I-620	049
KLOSTERKELLER SIEGENDORF	2066	0164	AUSTRIAN PINOT BLANC WHITE WN	82-04-1914		82-04-09		NY-I-575	KS 3
KREMSER [illegible]	5932	0164	WHITE TABLE WINE	82-04-2977		82-04-09		NV-I-815	123-G
[illegible]	6931	0164	RHEINRIESLING WHITE WINE 1981	82-04-2067		82-04-16		CO-I-234	26-82
SCHLOSS GRAFENEGG	6931	0164	STRASSER BEERENAUSLESE 1976	82-04-2064		82-04-16		CC-I-234	25-82
SCHLOSS GRAFENEGG	6931	0164	GRUNER VELTLINER WHITE WINE 80	82-04-2065		82-04-16		CC-I-234	24-82
SCHLOSS MAISSAU	6931	0164	MULLER THURGAU WHITE WINE 1980	82-04-2066		82-04-16		CO-I-234	15-82
[illegible]	1561	0164	WHITE STICK WINE	82-04-2007		82-04-19		WI-I-613	3
BURGENLAND	7694	0164	ST GEORGENER WHITE WINE	82-04-2188		82-04-21		CA-I-1432	0287
BURGENLAND	7694	0164	ST GEORGENER WHITE WINE	82-04-2189		82-04-21		NY-I-531	0288
[illegible]	7135	0164	WHITE GRAPE WINE	82-04-3308		82-04-22		ILL-I-446	PI A 0453
[illegible]	7135	0164	WHITE GRAPE WINE	82-04-3309		82-04-22		ILL-I-446	PI A 0457
BURGENLAND	7694	0164	GRUNER VELTLINER WHITE WINE	82-04-2195		82-04-20		NY-I-531	0206
BURGENLAND	7694	0164	WEISSBURGUNDER WHITE WINE	82-04-2192		82-04-20		NY-I-531	0202
BURGENLAND	7694	0164	GEWURZTRAMINER WHITE WINE	82-04-2191		82-04-20		NY-I-531	0203
BURGENLAND	7694	0164	WELSCH RIESLING WHITE WINE	82-04-2190		82-04-20		NY-I-531	0209
BURGENLAND	7694	0164	PINOT BLANC WHITE WINE	82-04-2194		82-04-20		NY-I-531	0205
WINZERGENOSSENSCHAFT KREMS	0680	0164	GRUNER VELTLINER	82-04-3717		82-04-20		NY-I-449	232
J. HERRMANSCHES WEINE.	6039	0164	TABLE WINE	82-05-2645		82-05-07		ILL-I-445	9600
RICHARD [illegible]	9767	0164	NEUSIEDLER SEE SPATLESE WHITE	82-05-3551		82-05-10		FL-I-606	113
VIENNA WHITE	4903	0164	WHITE QUALITY WINE	82-05-2441		82-05-13		[illegible]-I-315	RD-111
KREMSER	7610	0164	RIESLING X SYLVANER WHITE WINE	82-05-2879		82-05-17		[illegible]-I-453	FLA-357-82
KREMSER	7610	0164	PINOT BLANC WHITE WINE	82-05-2880		82-05-17		TX-I-453	FLA-358-82
KREMSER [illegible]	7610	0164	WHITE WINE	82-05-2878		82-05-17		[illegible]-I-453	FLA-356-82
WEINGUT DER STADT KREMS	0615	0164	PINOT BLANC	82-05-1566		82-05-19		[illegible]-I-572	DGI-573-52
KAISER PROBUS	5022	0164	WHITE TABLE WINE	82-06-3390		82-06-09		CA-I-2321	1
[illegible]	5022	0164	WHITE AUSTRIAN WINE	82-06-3391		82-06-09		CA-I-2321	2
PINOT CHARDONNAY MACON	3062	0164	FRENCH WHITE TABLE WINE	82-06-2033		82-06-10		I-96	963
KLOSTER WEINKELLERS	9531	0164	RUSTER BEERENAUSLESE WHT TBLS	82-06-4379		82-06-15		SC-I-278	024-82
KLOSTER WEINKELLERS	9533	0164	ST. GEORGENER SPATLESE	82-06-4381		82-06-15		SC-I-278	022-82
KLOSTER WEINKELLERS	9531	0164	RUSTER TROCKENBEERENAUSLESE	82-06-4370		82-06-15		SC-I-278	025 82
KLOSTER WEINKELLERS	9531	0164	RUSTER AUSLESE WHT TBLS WINE	82-06-4380		82-06-15		SC-I-278	023-82
RUSTER AUSLESE WELSCHRIESLING	9779	0164	AUSTRIAN WHITE TBLS WINE	82-06-4495		82-06-20		MD-I-324	62282-2
RUSTER BEERENAUSLESE	9779	0164	AUSTRIAN WHITE TBLS WINE	82-06-4496		82-06-20		MD-I-324	62282-1
RUSTER STORCH	9779	0164	BLAUFRANKISCH TBLS WINE	82-07-2973		82-07-09		MD-I-324	62282-4
ST MARGARETHENER	7135	0164	WHITE GRAPE WINE 1980	82-07-2359		82-07-19		IL-I-446	NH A 0026
DONNERSKIRCHNER SONNENBERG	7618	0164	TROCKENBEERENAUSLESE WHT TBLS	82-07-2451	T82-10-21	82-07-21		TX-I-453	FLA-401-82
DONNERSKIRCHNER SONNENBERG	7618	0164	SPATLESE 1977 WHITE TABLE WINE	82-07-2454	T82-10-21	82-07-21		TX-I-453	FLA-400-82
DONNERSKIRCHNER SONNENBERG	7618	0164	AUSLESE 1977 WHITE TABLE WINE	82-07-2453	T82-10-21	82-07-21		TX-I-453	FLA-398-82
DONNERSKIRCHNER SONNENBERG	7618	0164	BEERENAUSLESE WHITE TBLS WINE	82-07-2455		82-07-21		TX-I-453	FLA-402-82
EISWEIN	7618	0164	WHITE TABLE WINE 1978	82-07-2452	T82-10-21	82-07-21		TX-I-453	FLA-399-82
GUMPOLDSKIRCHNER	4983	0164	WHITE WINE	82-07-2078		82-07-28		MD-I-315	RD-106
GUMPOLDSKIRCHNER [illegible]	4983	0164	WHITE AUSTRIAN WINE	82-07-2076		82-07-28		MD-I-315	RD-105
KAISER PROBUS	5980	0164	WHITE WINE	82-07-2075		82-07-28		MD-I-315	RD-104
VIENNA WHITE	4983	0164	AUSTRIAN WHITE WINE	82-07-2077		82-07-28		MD-I-315	RD-101
KREMSER	3213	0164	HEURIGER-AUSTRIAN RIESLING 81	82-08-1722		82-08-17		TEN-I-249	I-1070
GUMPOLDSKIRCHNER OF [illegible]	7633	0164	WHITE AUSTRIAN WINE	82-08-3747	T82-09-12	82-08-17		PA-I-361	SI-8/9/82
BRUDER GUTT	0853	0164	TROCKENBEERENAUSLESE	82-08-1924		82-08-19		NY-I-853	32
BRUDER GUTT	0853	0164	[illegible] WHITE WINE	82-08-1926		82-08-19		NY-I-853	30

BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS
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BRUDER GRILL	0830	8164	EISPRINZESSIN WHITE WINE	82-08-1925		82-08-15		NY-I-053	31
BRUDER GRILL	0830	8164	FELSENKONIG WHITE WINE	82-08-1927		82-08-19		NY-I-053	27
ENGELSBURG	5916	8164	1979 FRAUENKIRCHNER BEERENAUSLE	82-08-3229		82-08-19		I-349	M-1227
ENGELSBURG	5916	8164	1980 RUSTER AUSLESE	82-08-3233		82-08-19		I-349	M-1222
ENGELSBURG	5916	8164	1981 ST. GEORGENER SPATLESE	82-09-3228		82-08-19		I-349	M-1228
HAPPY PEPPY	0830	8164	NATURAL SPARKLING WHITE WN	82-08-1740		82-08-24		FL-I-635	9077
OSTERREICH	4790	8164	MUSKAT-OTTONEL SPATLESE	82-08-2902		82-08-30		NM-I-121	102
OSTERREICH	4790	8164	GEWURZ TRAMINER AUSLESE	82-08-2904		82-08-31		NM-I-121	101
OSTERREICH	4750	8164	RHEINRIESLING WHITE RIESLING	82-08-2903		82-08-30		NM-I-121	105
OSTERREICH	4750	8164	GRUNER VELTLINER	82-08-2901		82-08-30		NM-I-121	106
KLOSTER WINECELLARS	9503	8164	WHITE TABLE WINE	82-09-4220		82-09-01		SC-I-270	027-82
KLOSTER WINECELLARS	9503	8164	RUSTER BEERENAUSLESE	82-09-4221		82-09-01		SC-I-270	028-82
KLOSTER WINECELLARS	9503	8164	ST. GEORGENER SPATLESE	82-09-4219		82-09-01		SC-I-270	026-82
JACOB GERHARDT	1782	8164	WHITE STILL WINE	82-09-2316		82-09-15		L-I-913	GW-07
JACOB GERHARDT	1422	8164	OESTERREICH WHITE STILL WINE	82-09-2650		82-09-15		ILL-I-415	G77
JACOB GERHARDT	1422	8164	RHEINHESSEN WHITE STILL WINE	82-09-2651		82-09-15		ILL-I-415	G-78
SCHLOSSADLER	4179	8164	RED GRAPE WINE	82-09-3643		82-09-22		CA-I-2202	16
RITZINGER	9779	8164	AUSTRIAN WHITE TABLE WINE,	82-10-4107		82-10-04		PC-I-324	92382-2
FERDINAND PIEROTH GMBH	7135	8164	GERMAN WHITE GRAPE WINE 1979	82-10-3272		82-10-05		ILL-I-446	PI A 048
SCHLOSSWEINGUT FRH. GEYMULLER	1599	8164	HOLLENBURGER LUSTHAUSBERG KAB	82-10-2299		82-10-06		CT-I-173	82/139
WINZER KREMS	8640	8164	GRUNER VELTLINER	82-10-3764		82-10-07		NY-I-449	247
JOHANN KELLER	4660	8164	AUSTRIAN WHITE DRY WINE	82-10-2703		82-10-13		[illegible]-I-321	92982-1
JOHANN KELLER	4660	8164	AUSTRIAN WHITE DRY WINE	82-10-2704		82-10-13		MI-I-321	92882-1
JOHANN KELLER	4660	8164	AUSTRIAN WHITE DRY WINE	82-10-2705		82-10-13		MI-I-321	92882-2
KLOSTERKELLER SIEGENDORF	0966	8164	LATEPICKING-DRY RIESLING	82-10-1703		82-10-14		KY-I-979	KS 4
KLOSTERKELLER SIEGENDORF	4660	8164	PRIVATE RESERVE DRY WHT WINE	82-10-2706		82-10-19		MI-I-321	91582-A
KLOSTERKELLER SIEGENDORF	7364	8164	PRIVATE-RESERVE WHT WINE	82-10-3321		82-10-19		MD-I-242	1793
SCHLOSS GRAFENEGG	1737	8164	AUSTRIAN WHITE TABLE WINE	82-10-1822		82-10-22		WIS-I-285	10821
KLOSTERKELLER SIEGENDORF	6734	8164	AUSTRIAN WHITE TABLE WINE	82-10-2961		82-10-22		MA-I-122	101582
KLOSTERKELLER SIEGENDORF	7364	8164	GEWURZTRAMINER WHITE TB WINE	82-11-3812		82-11-01		MD-I-242	1798
KLOSTERKELLER SIEGENDORF	7364	8164	PRIVATE RESERVE WHITE TB WINE	82-11-3813		82-11-01		MD-I-242	1794
KLOSTERKELLER SIEGENDORF	7364	8164	TROCKENBEERENAUSLESE WHT TB	82-11-3809		82-11-01		MD-I-242	1801
KLOSTERKELLER SIEGENDORF	7364	8164	GRUNVELTLINER WHITE TB WINE	82-11-3814		82-11-01		MD-I-242	1795
KLOSTERKELLER SIEGENDORF	7364	8164	SCHLOSSWEIN WHITE TABLE WINE	82-11-3816		82-11-01		MD-I-242	1797
KLOSTERKELLER SIEGENDORF	7364	8164	BLAUFRANKISCH WHITE TB WINE	82-11-3815		82-11-01		MD-I-242	1796
KLOSTERKELLER SIEGENDORF	7364	8164	SCHLOSSWEIN WHITE TB WINE	82-11-3811		82-11-01		MD-I-242	1799
KLOSTERKELLER SIEGENDORF	7364	8164	BEERENAUSLESE WHITE TB WINE	82-11-3810		82-11-01		MD-I-242	1800
RITZINGER	7418	8164	AUSTRIAN WHITE TABLE WINE	82-11-3069		82-11-04		TX-I-453	FLA-430-82
ENGELSBURG	5916	8164	GERMAN WHITE TABLE WINE 1981	82-11-3190		82-11-08		I-349	M 1246
WACHOVIA	9395	8164	AUSTRIAN WHITE WINE	82-11-4433		82-11-10		NC-I-349	00001
WACHOVIA	9395	8164	AUSTRIAN WHITE WINE	82-11-4434		82-11-10		NC-I-349	00002
KLOSTERKELLER SIEGENDORF	9809	8164	AUSTRAIAN WHITE TABLE WINE	82-11-4680		82-11-10		LA-I-225	1513
WEINGUT BRUNDLMAYER	1960	8164	PINOT CHARDONNAY	82-11-2614		82-11-12		I-1001	H-W-376
WEINGUT BRUNDLMAYER	1560	8164	RIESLING SPATLESE	82-11-2616		82-11-12		I-1001	H-W-375
WEINGUT BRUNDLMAYER	1560	8164	RIESLING-SYLVANER	82-11-2615		82-11-12		I-1001	H-W-377
WEINGUT BRUNDLMAYER	1560	8164	RULANDER AUSLESE	82-11-2617		82-11-12		I-1001	H-W-374
KLOSTERKELLER SIEGENDORF	9809	8164	AUSTRAIAN WHITE TABLE WINE	82-11-4683		82-11-12		LA-I-225	1512
KLOSTERKELLER SIEGENDORF	9809	8164	AUSTRAIAN WHITE TABLE WINE	82-11-4686		82-11-12		LA-I-225	1519
KLOSTERKELLER SIEGENDORF	9809	8164	AUSTRAIAN WHITE TABLE WINE	82-11-4684		82-11-12		LA-I-225	1515
KLOSTERKELLER SIEGENDORF	9809	8164	AUSTRAIAN WHITE TABLE WINE	82-11-4687		82-11-12		LA-I-225	1520
KLOSTERKELLER SIEGENDORF	9809	8164	AUSTRAIAN WHITE TABLE WINE	82-11-4682		82-11-12		LA-I-225	1516
KLOSTERKELLER SIEGENDORF	9809	8164	AUSTRAIAN WHITE TABLE WINE	82-11-4681		82-11-12		LA-I-225	1517
KLOSTERKELLER SIEGENDORF	9809	8164	AUSTRAIAN WHITE TABLE WINE	82-11-4685		82-11-12		LA-I-225	1514
KREMSER	9779	8164	AUSTRIAN WHITE TB WINE	82-11-4623		82-11-15		MO-I-324	11152-1
ST. MARTINUS	0431	8164	MUSKAT-OTTONEL SPATLESE WHT	82-11-1993		82-11-18		FL-I-635	4077

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WINZERGENOSSENSCHAFT	1627	8164	AUSTRIAN WHITE TABLE WINE	82-11-2072		82-11-23	CA-I-898	504
ST. KUNIMERT GMBH	8146	8164	AUSTRIAN WHITE TABLE WINE	82-11-4015		82-11-24	ILL-I-370	130
WINZERVERBAND	6022	8164	AUSTRALIAN WHITE TABLE WINE	82-11-3206		82-11-30	CA-I-1725	MD 104
KUSTER	0219	8164	AUSTRIAN WHITE TABLE WINE	82-12-1197		82-12-01	TX-I-249	1-2147
WEINGUT DER STADT KREMS-OSTERR	0219	8164	AUSTRIAN WHITE TABLE WINE	82-12-1196		82-12-01	TX-I-249	1-2148
WINZERGENOSSENSCHAFT KREMS	0219	8164	AUSTRIAN WHITE TABLE WINE	82-12-1195		82-12-01	TX-I-249	1-2149
NIEDEROSTERREICHISCHER WINZERV	6022	8164	GERMAN WHITE TABLE WINE	82-12-2138		82-12-01	CA-I-1725	MD 105
KREMS GRUNER VELTLINER	9779	8164	AUSTRIAN WHITE TABLE WINE	82-12-1138	TH2-03-30	82-12-02	NC-I-324	112482-11
SCHLOSSWEINGUT GRAF HARDEGG	9779	8164	STEINBUGEL WHITE WINE	82-12-3019		82-12-02	MC-I-324	112482-12
SCHLOSSWEINGUT GRAF HARDEGG	9779	8164	SEEFELDER HOFKELLERBERG	82-12-3018		82-12-02	MC-I-324	112482-4
NIEDEROSTERREICHISCHER WINZERV	6022	8164	GERMAN WHITE TABLE WINE	82-12-2137		82-12-06	CA-I-1725	MD 107
KLOSTERKELLER SIEGENDORF	6234	8164	RLNG SPATLESE TROCKEN	82-12-2190		82-12-22	MASS-I-122	12002
KREMSER ROSENGARTEN	9779	8164	WHITE QUALITY WINE	82-12-3017		82-12-30	MC-I-324	121582-1
HARDYS CHOICE	6022	8164	STADTSIEGEL RED WINE	83-01-2448		83-01-14	CA-I-1725	MD-108
HARDYS CHOICE	6022	8164	WHITE WINE	83-01-2447		83-01-19	CA-I-1725	MD-109-A
1000 EIMER BERG	4508	8164	WHITE WINE 1979	83-01-2204		83-01-20	CA-I-2429	LW1002082
DURNSTEINER KELLERBERG	4904	8164	WHITE WINE 1981	83-01-2205		83-01-20	CA-I-2429	LW1001082
KREMSER	9316	8164	WHITE WINE	83-02-1758		83-02-07	CO-I-263	0-4
KREMSER PINOT BLANC	9316	8164	WHITE WINE	83-02-3762		83-02-07	CC-I-263	0-2
KREMSER SCHMIDT	9316	8164	KABINETT WINE	83-02-3759		83-02-07	CO-I-263	0-3
KREMSER SPATLESE	9316	8164	WHITE WINE	83-02-3761		83-02-07	CC-I-263	0-5
KREMSER SPATLESE	9316	8164	WHITE WINE	83-02-3760		83-02-07	CC-I-263	0-1
SCHLOSSWEINGUT FRH. V. GEYMULL	3555	8164	MULLER THURGAU 1981	83-03-2504		83-03-03	CT-I-173	83/42
BLUMENGARTEN SELECTION	3756	8164	AUSTRIAN WHITE WINE 1981	83-03-2686		83-03-07	S-I-83	1149
BLUMENGARTEN SELECTION	3756	8164	AUSTRIAN WHITE WINE 1980	83-03-2687		83-03-07	S-I-83	1150
THE HOUSE OF THE GOLDEN CHAPEL	3756	8164	AUSTRIAN WHITE WINE 1981	83-03-2688		83-03-07	S-I-83	1145
THE HOUSE OF THE GOLDEN CHAPEL	3756	8164	AUSTRIAN WHITE WINE 1981	83-03-2689		83-03-07	S-I-83	1144
THE HOUSE OF THE GOLDEN CHAPEL	3756	8164	AUSTRIAN RUSTER AUSLESE 1980	83-03-2685		83-03-07	S-I-83	1146
ALL AUSTRIAN WINES & SPIRIT	8680	8164	NEUSIEDLER WHITE WINE	83-03-3787		83-03-08	NY-I-449	266
WINZERGENOSSENSCHAFT KREMS	0063	8164	AUSTRIAN WHITE QUALITY WINE	83-03-1662		83-03-21	CA-I-1001	WK 83-10
WINZERGENOSSENSCHAFT KREMS	0063	8164	AUSTRIAN WHITE QUALITY WINE	83-03-1663		83-03-21	CA-I-1001	WK 83-8
WINZERGENOSSENSCHAFT KREMS	0063	8164	AUSTRIAN WHITE QUALITY WINE	83-03-1663		83-03-21	CA-I-1001	WK 83-7
WINZERGENOSSENSCHAFT KREMS	0063	8164	AUSTRIAN WHITE QUALITY WINE	83-03-1661		83-03-21	CA-I-1001	WK 83-9
JAKOB GERHARDT	1702	8164	GERMAN WHITE STILL WINE	83-03-2177		83-03-22	PL-I-752	GW-20
WINZER-KREMS	0265	8164	VARGA'S WHITE TABLE WINE	83-03-3701		83-03-22	TX-I-530	A-319-0313
BLUMENGARTEN SELECTION	6012	8164	BEERENAUSLESE 1981 AUSTRIAN	83-03-3310		83-03-23	NY-I-305	83-300
BLUMENGARTEN SELECTION	6012	8164	RUSTER 1980 AUSLESE AUSTRIAN	83-03-3311		83-03-23	NY-I-305	83-337
GRINZINGER NUSSBERGER	8256	8164	WHITE WINE	83-04-3501		83-04-05	TX-I-533	A-318-0314
I HEURIGEN	8256	8164	WHITE WINE	83-04-3505		83-04-05	TX-I-533	A-318-0317
SCHLOSSWEIN	8256	8164	WHITE WINE	83-04-3506		83-04-05	TX-I-530	A-318-0316
STRASSER	8256	8164	AUSTRIA WINE	83-04-3504		83-04-05	TX-I-533	A-318-0318
STRASSER	8256	8164	WHITE WINE	83-04-3503		83-04-05	TX-I-530	A-318-0319
[illegible] WEINGUT	8256	8164	WHITE WINE	83-04-3502		83-04-05	TX-I-530	A-318-0315
[illegible]	7135	8164	PIESPORTER [illegible] AUSLESE WIN	83-04-3333		83-04-?0	ILL-I-466	NM-A-3331
KLOSTERKELLER SIEGENDORF	3066	8164	RIESLING WINE	83-04-2979		83-04-12	NY-I-575	RS 4
JAKOB GERHARDT	9622	8164	WHITE STILL WINE	83-04-2504		83-04-12	ILL-I-415	G-07
FALKENSTEINER	1756	8164	AUSTRIAN WHITE WINE	83-04-2690		83-04-13	S-I-83	1169
FALKENSTEINER	1756	8164	AUSTRIAN WHITE WINE	83-04-2689		83-04-13	S-I-83	1167
GOLDEN CHAPEL	1756	8164	AUSTRIAN WHITE WINE	83-04-2691		83-04-13	S-I-83	1168
EWALD PFEIFFER	3553	8164	FALKENSTEINER GRUNER VELTLINER	83-04-2616		83-04-14	CT-I-173	83-52
EWALD PFEIFFER	3553	8164	[illegible] AUS. WHITE WINE	83-04-2615		83-04-14	CT-I-173	83-51
MARGARETHENER	0063	8164	BEERENAUSLESE WINE	83-04-3561		83-04-21	FL-I-552	10029
FISCHER	3613	8164	AUSTRIAN WHITE TABLE WINE	83-04-1093		83-04-27	FL-I-635	6977
PRIVATE RESERVE [illegible]	9256	8164	DRY WHITE WINE	83-05-2033		83-05-04	TX-I-626	0256
PRIVATE RESERVE	9256	8164	DRY WHITE WINE	83-05-2034		83-05-12	TX-I-626	0279

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KLOSTERKELLER SIEGENDORF	3656	8164	RIESLING KABINETT WHT WINE	83-05-3293	T83-08-14	83-05-16		O-I-327	H-1107-6
KLOSTERKELLER SIEGENDORF	3656	8164	TROCKENBEERENAUSLESE WHT	83-05-3290		83-05-16		O-I-327	H-1111-6
KLOSTERKELLER SIEGENDORF	3656	8164	JOHANNISBERG RIESLING	83-05-3292		83-05-16		O-I-327	H-1108-6
KLOSTERKELLER SIEGENDORF	3656	8164	GRUNVELTLINER KABINETT	83-05-3294		83-05-16		C-I-327	H-1106-6
KLOSTERKELLER SIEGENDORF	3656	8164	GEWURZTRAMINER KABINETT	83-05-3291		83-05-16		C-I-327	H-1109-6
KLOSTERKELLER SIEGENDORF	6736	8164	EISWEIN AUSTRIA WHT WINE	83-05-3977		83-05-18		MASS-I-122	51083
WINZERHAND GUMPOLDSKIRCHNER	7779	8164	AUSTRIAN WHITE TABLE WINE	83-05-5787		83-05-19		MC-I-324	51183-2
SCHLOSS GRAFENEGG	6366	8164	GERMAN WHITE TABLE WINE 1979	83-05-4071		83-05-27		GA-I-296	AU 009
SCHLOSS GRAFENEGG	6366	8164	KREMSER SPATLESE GRUNER VELTLI	83-05-4067		83-05-27		GA-I-296	AU 005
SCHLOSS GRAFENEGG	6366	8164	RHEINRIESLING 1982 WHT WINE	83-05-4068		83-05-27		GA-I-296	AU 006
SCHLOSS GRAFENEGG	6366	8164	GERMAN WHITE TABLE WINE	83-05-4070		83-05-27		GA-I-296	AU 009
SCHLOSS GRAFENEGG	6366	8164	GRUNER VELTLINER 1982 WHT WINE	83-05-4065		83-05-27		GA-I-296	AU 003
SCHLOSS GRAFENEGG	6366	8164	RHEINRIESLING 1982 KABINETT	83-05-4069		83-05-27		GA-I-296	AU 007
SCHLOSS GRAFENEGG	6366	8164	GRUNER VELTLINER 1982 WHT	83-05-4066		83-05-27		GA-I-296	AU 004
SCHLOSS MAISSAU	6366	8164	MULLER THURGAU 1980 WHT	83-05-4073		83-05-27		GA-I-296	AU 011
SCHLOSS MAISSAU	6366	8164	RIESLING SYLVANER 1980 WHT	83-05-4074		83-05-27		GA-I-296	AU 012
SCHLOSS MAISSAU	6366	8164	GRUNER VELTLINER 1980 WHT	83-05-4072		83-05-27		GA-I-296	AU 010
SCHLOSS WILLERSDORF	6366	8164	GRUNER VELTLINER 1979 WHT	83-05-4075		83-05-27		GA-I-296	AU 013
SCHLOSSWEINGUT GRAF HARDEGG	9779	8164	AUSTRIAN WHITE WINE	83-06-5010		83-06-01		MC-I-324	52083-7
SCHLOSSWEINGUT GRAF HARDEGG	9779	8164	AUSTRIAN WHITE WINE	83-06-5018		83-06-01		MC-I-324	52083-9
SCHLOSSWEINGUT GRAF HARDEGG	9779	8164	AUSTRIAN WHITE WINE	83-06-5017		83-06-01		MC-I-324	52083-8
SCHLOSSWEINGUT GRAF HARDEGG	9779	8164	AUSTRIAN WHITE WINE	83-06-5015		83-06-01		MC-I-324	52083-4
DONAUTEN WEIN	9779	8164	AUSTRIAN WHT TABLE WINE	83-06-5008		83-06-09		MC-I-324	6183-3
SCHLOSSKING	9779	8164	AUSTRIAN WHT TABLE WINE	83-06-5007		83-06-09		MC-I-324	6183-2
ST. LAURENT	9779	8164	AUSTRIAN WHT TABLE WINE	83-06-5006		83-06-09		MC-I-324	6183-6
HERRENHAUS	9779	8164	AUSTRIAN WHITE WINE	83-06-5013		83-06-10		MC-I-324	6183-4
LUMPENTURL	9779	8164	AUSTRIAN WHITE WINE	83-06-5011		83-06-10		MC-I-324	6183-1
PRINSDORFER	9779	8164	AUSTRIAN WHITE WINE	83-06-5012		83-06-10		MC-I-324	6183-5
GEYMULLER	9779	8164	AUSTRIAN WHITE WINE	83-06-5016		83-06-14		MC-I-324	52083-3
HERRENHAUS	9779	8164	AUSTRIAN WHITE WINE	83-06-5014		83-06-15		MC-I-324	6083-1
KLOSTERKELLER SIEGENDORF	4660	8164	CHARDONNAY DRY WHT WINE	83-06-3057		83-06-16		MINN-I-321	61083
BURGENLANDISCHER	9779	8164	RUSTER BEERENAUSLESE	83-06-5009		83-06-24		MC-I-324	52083-5
SCHLOSSAUER	8123	8164	MONCHHOFER PUSZTAGOLD 1982	83-07-4297		83-07-01		CA-I-22	17
HERMANN DORNSCHLAGER	4316	8164	DONNERSKIRCHNER SONNENBERG	83-07-2903		83-07-06		FL-I-649	SIT/035
FERDINAND PIEROTH	7135	8164	DONNERSKIRCHNER BEERENAUSLESE	83-07-3889		83-07-12		ILL-I-466	PI 0948
FERDINAND PIEROTH	7135	8164	DONNERSKIRCHNER BEERENAUSLESE	83-07-3888		83-07-12		ILL-I-466	PI A 0949
HERMANN DORNSCHLAGER	4316	8164	DONNERSKIRCHNER SONNENBERG	83-07-2904		83-07-13		FL-I-649	SIT/012
KLOSTERKELLER SIEGENDORF	6736	8164	CHARDONNAY KABINETT 1981	83-07-3596		83-07-13		MASS-I-122	43083
GOLDEN STORK	7229	8164	RUSTER SPATLESE WHT	83-07-3997		83-07-13		CA-I-2441	RK 13
GREEN STORK	7229	8164	RUSTER GRUENER VELTLINER	83-07-3995		83-07-13		CA-I-2441	RK 12
WHITE STORK	7229	8164	RUSTER RIESLING	83-07-3996		83-07-13		CA-I-2441	RK 14
CARL SITTMANN	6437	8164	DONNERSKIRCHNER SONNENBERG	83-07-3761		83-07-18		ILL-I-445	10067
[illegible] GOLDBERG	4144	8164	AUSTRIAN WHITE WINE	83-08-3833		83-08-04		ILL-I-370	172
RUST NEUSIEDLERSEE SPATLESE	4144	8164	AUSTRIAN WHITE WINE	83-08-3834		83-08-04		ILL-I-370	171
SAVIGNON BLANC	5321	8164	ARGENTINA WHITE TABLE WINE	83-08-2592	T84-05-31	83-08-08		NY-I-943	ITH-3
ST. GEORGENER SPATLESE	6839	8164	WELSCH-RIESLING 1979	83-08-3403		83-08-09		ILL-I-445	13109
BURG SENFTENBERG	5515	8164	AUSTRIAN 1979 WHT WINE	83-08-3110		83-09-11		IL-I-660	14N00175
BURG SENFTENBERG	5515	8164	AUSTRIAN 1981 WHT WINE	83-08-3111		83-09-11		IL-I-660	14N00275
SCHLOSS MAISSAU	5515	8164	MULLER THURGAU 1982	83-08-3112		83-09-11		IL-I-660	14N00575
SCHLOSS MAISSAU	5515	8164	GRUNER VELTLINER 1980	83-08-3113		83-09-11		IL-I-660	14N00475
KREMSER WHITE	9779	8164	GRUNER VELTLINER	83-08-6012		83-09-18		MC-I-324	8983-6
RUSTER GRUNER VELTLINER	9779	8164	GREEN STORK	83-08-6015		83-09-18		MC-I-324	8983-2
RUSTER RIESLING	9779	8164	WHITE STORK	83-08-6013		83-09-19		MC-I-324	8983-4
RUSTER SPATLESE	9779	8164	GOLDEN STORK	83-08-6014		83-09-19		MC-I-324	8983-1
GEWURZ-TRAMINER	6319	8164	STILL TABLE WINE	83-08-2581		83-09-22		VA-I-163	4722

BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS
CERTIFICATE OF LABEL APPROVAL (COLA) SYSTEM

BRAND NAME	VEND CODE	C/I CODE	CLASS/TYPE (C/I) DESCRIPTION	DOCUMENT SERIAL NBR	CANCEL OR TEMP DATE	DATE OF APPROVAL FORM	PLANT OR PERMIT NBR	APPLICANT SERIAL NBR
STEINWIEGEL MUSKAT OTTONEL	4119	8164	STILL TABLE WINE	83-08-2587		83-08-22	VA-I-363	4723
TRAMINER	4119	8164	STILL TABLE WINE	83-08-2586		83-08-22	VA-I-363	4725
WEISSBURGUNDER	4119	8164	PINOT BLANC-DRY	83-08-2585		83-08-22	VA-I-360	4726
DONAURIESLING	7116	8164	AUSTRIAN WHT WINE	83-08-4490		83-08-24	CC-I-263	0-9
GRUNER VELTLINER	7116	8164	SPATLESE	83-08-4489		83-08-24	CC-I-263	0-10
RUSTER WHITE	7116	8164	AUSTRIAN WHT WINE	83-08-4488		83-08-24	CO-I-263	DR-2
RUSTER TROCKENBEEREN	7229	8164	AUSLESE	83-08-3569		83-08-26	CA-I-2261	BK 11
GRUNER VELTLINER	4951	8164	GERMAN WHITE STILL WINE	83-08-2012		83-08-31	MI-I-414	LM-004
PINOT BLANC	4958	8164	GERMAN WHITE STILL WINE	83-08-2013		83-08-31	MI-I-414	LM-003
TROCKENBEERENAUSLESE	4998	8164	GERMAN WHITE STILL WINE	83-08-2011		83-08-31	MI-I-414	LM-006
WELSCHRIESLING	4998	8164	GERMAN WHITE STILL WINE	83-08-2014		83-08-31	MI-I-414	LM-005
DONAUBURG	0430	8164	DANUBE-CASTLE WHT WINE	83-09-1318A		83-09-02	TX-I-555	1277
DONAUBURG	0430	8164	DANUBE-CASTLE DRY WHT WINE	83-09-1318B		83-09-02	TX-I-555	1377
PINOT CHARDONNAY	7116	8164	GRINZINGER NUSSBERGER DRY SEC	83-09-3561		83-09-10	CC-I-263	09-1
KREMSER HUNGERAU	9116	8164	GRUNER VELTLINER SPATLESE	83-09-3560		83-09-12	CO-I-263	0-10.1
GUMPOLDSKIRCHNER	3622	8164	SPATROT-ROTGIPFLER	83-09-3768		83-09-12	IL-I-596	CH-83-005
WHITE SHIRAZ	1451	8164	AUSTRALIAN WHT WINE	83-09-1322		83-09-13	CA-I-2272	27
MAJESTY	0430	8164	TRAMINER BEERENAUSLESE	83-09-1318		83-09-14	FL-I-635	6577
MAJESTY	0430	8164	BOUVIERTRAUBE TROCKENBEERENAUS	83-09-1317		83-09-1[illegible]	FL-I-635	6577
SAUVIGNON BLANC	0366	8164	KABINETT	83-09-1511		83-09-20	NY-I-575	KS 7
FRAUENKIRCHNER STEINGANG	7135	8164	EISWEIN 1980	83-09-3040		83-09-26	ILL-I-446	PI A 0558
GRUNER VELTLINER-KABINETT	5535	8164	AUSTRIAN WHT TB WINE 1982	83-09-2520		83-09-28	IL-I-660	12WC0375
PINOT BLANC-KABINETT	5535	8164	AUSTRIAN WHT TB WINE 1982	83-09-2519		83-09-28	ILL-I-660	12WC0975
RIESLING-KABINETT	5535	8164	AUSTRIAN WHT TB WINE 1982	83-09-2521		83-09-28	IL-I-660	12WC0275
ARISTOKRAT	0630	8164	RHEINRIESLING SPATLESE 1981	83-09-1316		83-09-30	FL-I-635	2677
GRUNER VELTLINER	1273	8164	WHITE WINE	83-10-2001		83-10-03	TX-I-555	6177
SCHLOSS GOBELSBURG	5535	8164	HOLYSTONE GRUNER VELTLINER	83-10-3410		83-10-04	IL-I-660	15NOC275
SCHLOSS GOBELSBURG	5535	8164	HOLYSTONE RIESLING 1982	83-10-3409		83-10-04	IL-I-660	15NO0375
SCHLOSS GOBELSBURG	5535	8164	HOLYSTONE MESSWEIN 1982	83-10-3411		83-10-04	IL-I-660	15NOC175
FOFISTALER KAISERGARTEN	7135	8164	TROCKENBEERENAUSLESE 1981	83-10-3786		83-10-05	ILL-I-446	PI A 0059
BADENER	0811	8164	GEWURZTRAMINER AUSLESE 1979	83-10-1848		83-10-06	WA-I-890	AUS 105 W
BADENER	0811	8164	MUSKAT OTTONEL 1981	83-10-1852		83-10-06	WA-I-890	AUS 101 W
FALKENSTEINER	0811	8164	GRUNER VELTLINER 1982	83-10-1850		83-10-06	WA-I-890	AUS 103 W
GUMPOLDSKIRCHNER	0811	8164	NEUBURGER SPATLESE 1981	83-10-1851		83-10-06	WA-I-890	AUS 102 W
SCHLOSSKOGL	0811	8164	WHITE AUSTRIAN WINE 1982	83-10-1847		83-10-06	WA-I-890	AUS 106 W
WEISSER BURGUNDER	0811	8164	KABINETT 1981	83-10-1849		83-10-06	WA-I-890	AUS 104 W
KREMSER WHITE	9779	8164	GRUNER VELTLINER 1982	83-10-5026		83-10-13	MC-I-324	8883-5
JOS. V. DAWEN SOHNE	1559	8164	ST. MARGARETHENER BEERENAUSLES	83-10-2763		83-10-24	CT-I-173	83/281
JOS. V. DAWEN SOHNE	1559	8164	ST. MARGARETHENER AUSLESE	83-10-2762		83-10-24	CT-I-173	83/281
JOS. V. DAWEN SOHNE	1559	8164	ST. GEORGENER SPATLESE 1982	83-10-2764		83-10-24	CT-I-173	83/280
JOS. V. DAWEN SOHNE	1559	8164	RUST NEUSIEDLERSEE 1981	83-10-2765		83-10-24	CT-I-173	83/279
ZIMMERMANN-GRAEFF	3674	8164	APETLONER BEERENAUSLESE 1982	83-10-1727		83-10-25	CH-I-503	655
FRAUENKIRCHNER STEINGANG	7135	8164	EISWEIN 1980	83-10-3785		83-10-28	ILL-I-446	PI A 0558A
APETLONER BEERENAUSLES	9575	8164	GERMAN WHT TB WINE 1982	83-10-4911		83-10-[illegible]0	MI-I-403	JE-83-1
APETLONER BEERENAUSLES	7147	8164	AUSTRIAN STILL WINE 1982	83-10-3789		83-10-31	KY-I-346	0-101
RUSTER AUSLESE	0674	8164	WEISSBURGUNDER 1982	83-11-1597		83-11-03	CH-I-503	680
ARISTOKRAT	1293	8164	WEISSBURGUNDER SPATLESE 1979	83-11-1989		83-11-03	TX-I-555	2077
ARISTOKRAT	1293	8164	TRAMINER KABINETT 1981	83-11-1986		83-11-03	TX-I-555	1677
ARISTOKRAT	1293	8164	RHEINRIESLING KABINETT 1981	83-11-1987		83-11-03	TX-I-555	1777
ARISTOKRAT	1293	8164	MUSKAT OTTONEL SPATLESE 1981	83-11-1988		83-11-03	TX-I-555	1977
ARISTOKRAT	1293	8164	MUSKAT OTTONEL KABINETT 1981	83-11-1990		83-11-03	TX-I-555	1977
RUST NEUSIEDLERSEE	1559	8164	SPATLESE 1981	83-11-2460		83-11-04	CT-I-173	83/324
AUSTRIAN SUNHILL	6274	8164	GRUNER VELTLINER DRY 1982	83-11-2755		83-11-04	FL-I-730	14
OESTERREICH	3422	8164	FRAUENKIRCHNER TROCKENBEERENAU	83-11-2420		83-11-07	ILL-I-415	G095
RUST NEUSIEDLERSEE	1241	8164	TROCKENBEERENAUSLESE 1981	83-11-1984		83-11-09	DC-I-310	703

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ST. GEORGENER	1293	8164	SPATLESE 1982	83-11-1985		83-11-09		DC-1-313	704
ST. MARGARETHENER	1293	8164	BEERENAUSLESE 1981	83-11-1983		83-11-09		DC-1-313	706
ST. MARGARETHENER	1296	8164	AUSLESE 1982	83-11-1982		83-11-09		DC-1-310	705
GOLD ZIERFANDLER	1557	8164	WHITE TABLE WINE	83-11-2016C		83-11-15		CA-1-2104	AU-05-83
GRAND IMPERIAL	1557	8164	KSL KREMS ESTATE	83-11-3134		83-11-15		PHI-1-53	AU-01-83
GRAND IMPERIAL	1557	8164	AUSTRIAN RSLG DRY	83-11-2015W		83-11-15		PHI-1-53	AU-01-83
GRIMLING AUSLESE	1557	8164	WHITE TABLE WINE	83-11-2016B		83-11-15		CA-1-2134	AU-11-83
GRINZINGER REISENBERG	1557	8164	WHITE	83-11-3137		83-11-15		PHI-1-53	AU-10-83
GRINZINGER REISENBERG	1557	8164	WHITE WINE	83-11-2015V		83-11-15		PHI-1-53	AU-10-83
GUMPOLDS KIRCHNER	1557	8164	GOLD ZIERFANDLER 1981	83-11-3141		83-11-15		PHI-1-53	AU-09-83
GUMPOLDS KIRCHNER	1557	8164	SPATLESE 1981	83-11-3140		83-11-15		PHI-1-53	AU-06-83
GUMPOLDS KIRCHNER	1557	8164	GRIMLING AUS 1977	83-11-3139		83-11-15		PHI-1-53	AU-11-83
GUMPOLDS KIRCHNER	1557	8164	GEWURZTRAMINER 1982	83-11-3138		83-11-15		PHI-1-53	AU-11-83
KREMSER GOLDBERG	1557	8164	GRUNER VELTLINER KABINETT	83-11-2016D		83-11-15		CA-1-2104	AU-04-83
KREMSER GOLDBERG	1557	8164	GRUNER VELTLINER KAB	83-11-3142		83-11-15		PHI-1-53	AU-04-83
KREMSER RIESLING	1557	8164	KREMS REGION ESTATE	83-11-3143		83-11-15		PHI-1-53	AU-03-83
KREMSER RIESLING	1557	8164	AUSTRIAN WHITE WINE	83-11-2016E		83-11-15		CA-1-2104	AU-03-83
KREMSER SPATLESE	1557	8164	GRUNER VELTLINER	83-11-3144		83-11-15		PHI-1-53	AU-02-83
KREMSER SPATLESE	1557	8164	GRUNER VELTLINER	83-11-2016F		83-11-15		CA-1-2104	AU-02-83
SOUND OF MUSIC	6324	8164	GRUNER VELTLINER 1982	83-11-3991		83-11-15		NJ-1-433	83-11-1
RUSTER SPATLESE	7147	8164	WEISSBURGUNDER 1982	83-11-3873		83-11-15		KY-1-346	N-103
OESTERREICH	1782	8164	FRAUENKIRCHNER TROCKENBEERENAU	83-11-2120		83-11-16		FL-1-752	GW-42
ST. GEORGENER SPATLESE	6809	8164	WELSCH-RSLG 1979	83-11-3775		83-11-17		ILL-1-445	614-18
GEWURZTRAMINER	1557	8164	AUSTRIAN WHITE WINE 1982	83-11-2016A		83-11-18		PHI-1-53	AU-11-83
RUSTER AUSLESE	7147	8164	WEISSBURGUNDER 1982	83-11-3872		83-11-18		KY-1-346	N-104
GUMPOLDS KIRCHNER	7229	8164	GOLD ZIERFANDLER 1981	83-11-3933		83-11-22		CA-1-2241	BW21
RUSTER AUSLESE	7229	8164	WELSCHRIESLING 1981	83-11-3934		83-11-22		CA-1-2241	BW17
KREMSER GOLDBERG	9779	8164	GEWURZTRAMINER SPATLESE	83-11-5040		83-11-23		MC-1-	201 3
KREMSER SCHMIDT	9779	8164	GRUNER VELTLINER KABINETT	83-11-5042		83-11-23		MD-1-	201
KREMSER SPATLESE	9779	8164	GRUNER VELTLINER 1981	83-11-5039		83-11-23		MC-1-	201C
TOWER OF KREMS	9779	8164	KREMSER PULVERTURM	83-11-5041		83-11-23		MD-1-	201 A
KONFRAHUCH	1557	8164	MUSKAT-OTTONEL-SPAT	83-11-3136		83-11-30		PHI-1-53	AU-12-83
KIMFRAPUCH	1557	8164	MUSKAT-OTTONEL-SPATLESE	83-11-2015Z		83-11-30		I-1-53	AU-12-83
SCHLOSSWEIN	1557	8164	NEUBURGER	83-11-2015X		83-11-30		F 1-1-53	AU-13-83
SCHLOSSWEIN NEUBURGER	1557	8164	WHITE	83-11-3135		83-11-30		PHI-1-53	AU-13-83
GUMPOLDSKIRCHNER	9622	8164	ROTGIPFLER-SPATLESE	83-12-3443		83-12-05		-1-596	CH-83-310
SONNENBERGER KIRCHENGARTE P	2458	8164	TROCKENBEERENAUSLESE 1971	83-12-1710		83-12-06		CA-1-1432	965
ST. GEORGENER	1736	8164	SPATLESE 1982	83-12-2039		83-12-15		S-1-83	1331
GRUNER [illegible]	4319	8164	GRUNER VELTLINER 1980	83-12-2182		83-12-16		VA-1-360	4735
HORNSTEINERG	4319	8164	WELSCH-RSLG 1982	83-12-2177		83-12-16		VA-1-363	4732
OGGAUER WELSCHRIESLING	4319	8164	WHITE WINE 1981	83-12-2181		83-12-16		VA-1-360	4736
TRAMINER	4319	8164	AUSLESE 1981	83-12-2180		83-12-16		VA-1-363	4737
TRAMINER	4319	8164	SPATLESE 1982	83-12-2178		83-12-16		VA-1-360	4733
WEISSER HUSAR	4319	8164	RSLG SYLVANER 1981	83-12-2179		83-12-16		VA-1-360	4734
SCHWARZE KATZCHEN	1736	8164	GRUNER VELTLINER 1981	83-12-3029	T84-01-20	83-12-19		TX-1-530	A-1020-0378
ALTENBERG	9622	8164	TROCKENBEERENAUSLESE	83-12-3441		83-12-19		IL-1-596	CH-83-101
ALTENBERG	9622	8164	BEERENAUSLESE MULLER THURGAU	83-12-3442		83-12-19		IL-1-596	CH-83-100
RUST NEUSIEDLERSEE	1559	8164	TRAMINER TROCKENBEERENAUSLESE	83-12-1912		83-12-20		CT-1-173	83/337
ST. MARGARETHENER	1559	8164	WELSCHRIESLING BEERENAUSLESE	83-12-1911		83-12-20		CT-1-173	83/336
DURNSTEINER AUSLESE	5535	8164	VERSCHNITT MULLER-THURGAU	83-12-2471		83-12-21		IL-1-660	12WC0675
HIMMELSTIEGE	5535	8164	GRUNER VELTLINER SPATLESE	83-12-2473		83-12-21		IL-1-663	12WC0775
RIESLING SPATLESE	5535	8164	WHITE TABLE WINE 1977	83-12-2469		83-12-21		IL-1-660	12WC0575
WACHAU BLONDEL BLANC	5535	8164	PINOT BLANC 1982	83-12-2472		83-12-21		IL-1-663	12WC0175
SCHLOSS GOBELSBURG	5535	8164	HOLYSTONE GRUNER VELTLINER	83-12-2467		83-12-29		IL-1-660	19N00275
SCHLOSS GOBELSBURG	5535	8164	HOLYSTONE RIESLING 1982	83-12-2468		83-12-29		IL-1-663	19N00175

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SCHLOSS GOBELSBURG	5535	8164	HOLYSTCHE MESSWEIN 1982	83-12-2466		83-12-29		IL-I-660	15H00175
SPATBURGUNDER	1966	8164	PINOT NOIR CABINET 1975	84-01-1370		84-01-06		NY-I-575	JJ9
LANGENLOISER DECHANT	1960	8164	TRAMINER SPATLESE 1969	84-01-1893		84-01-13		I-1001	H-W-543
LANGENLOISER KIRCHENGARTEN	1960	8164	GRUNER VELTLINER AUSLESE 1969	84-01-1892		84-01-13		I-1001	H-W-542
LANGENLOISER SPIEGEL	1960	8164	WEISSER BURGUNDER EISWEIN AUSL	84-01-1894		84-01-13		I-1001	H-W-541
ILLMITZER KAISERGARTEN	7135	8164	BEERENAUSLESE 1983	84-01-2302		84-01-20		ILL-I-446	PI A 9574
ST. MARTINUS	1323	8164	WINZERWEIN 1982 WELSCHRIESLING	84-01-1453	T84-05-23	84-01-24		TX-I-555	4682
ST. MARTINUS	1323	8164	WINZERWEIN 1982 WELSCHRIESLING	84-01-1452	T84-06-23	84-01-24		TX-I-555	46821
GEWURZTRAMINER SPATLESE	5882	8164	WHITE WINE 1982	84-02-3172		84-02-02		CA-I-2321	7
GRINZINGER REISENBERG	5882	8164	WHITE WINE	84-02-3173		84-02-02		CA-I-2321	6
MAYER BEETHOVENHAUS	5882	8164	PSLG-BURGUNDER	84-02-3174		84-02-02		CA-I-2321	4
LENZ MOSER	4955	8164	VIN BLANC	84-02-2965		84-02-06		GA-I-425	001
CHATEAU VIENNA	1740	8164	RSLG KABINETT	84-02-2069		84-02-10		CA-I-1979	791
ST. MARTINUS	1323	8164	WINZERWEIN 1982	84-02-2073		84-02-15		TX-I-555	46820
BADENER	9779	8164	GEWURZTRAMINER AUSLESE	84-02-4228		84-02-21		PC-I-324	2084-5
BADENER	9779	8164	BEERENAUSLESE GEWURZTRAMINER	84-02-4230		84-02-21		MD-I-324	2084-6
DONAUBURG	9779	8164	DANUBE-CASTLE	84-02-4227		84-02-21		PC-I-324	2084-4
ST. MARGARETHNER	9779	8164	AUSLESE	84-02-4226		84-02-21		PC-I-324	2084-3
ST. MARGARETHNER	9779	8164	SPATLESE	84-02-4229		84-02-21		[illegible]-I-324	2084-2
RUSTER TROCKENBEEREN AUSLESE	9779	8164	AUSTRIAN WHITE	84-02-4231		84-02-22		[illegible]-I-324	2084-1
RIEKRUSSL	5535	8164	WHITE TABLE WINE 1982	84-02-3145		84-02-23		IL-I-663	00WC0975
LOIBNER BURGSTALL	5535	8164	RHEINRIESLING 1982	84-02-3149		84-02-23		[illegible]-I-660	09WC0575
LOIBNER GRUNER VELTLINER	5535	8164	WACHAUER WHITE WINE 1982	84-02-3147		84-02-23		IL-I-660	00WC0175
LOIBNER MOLLSTEINER	5535	8164	GRUNER VELTLINER 1982	84-02-3146		84-02-23		IL-I-663	00WC0975
LOIBNER MULLER THURGAU	5535	8164	WHITE TABLE WINE 1982	84-02-3144		84-02-23		IL-I-660	00WC0775
LOIBNER ROTHENBERG	5535	8164	RHEINRIESLING SPATLESE 1982	84-02-3150		84-02-23		IL-I-663	00WC0675
LOIBNER SCHUTT	5535	8164	WACHAUER 1982	84-02-3148		84-02-23		IL-I-660	00WC0375
FALKENSTEINER	9779	8164	GRUNER VELTLINER	84-02-4225		84-02-24		M[illegible]-I-324	21584-1
TRAPP FAMILY LODGE	7751	8164	PINOT BLANC-WEISSBURGUNDER 82	84-02-4211		84-02-27		VT-I-126	0335
DURNFASKIRCHNER SONNENBERG	1323	8164	SPATLESE	84-02-2071		84-02-29		TX-I-555	4377
PRINZ VON LEISSER	1323	8164	EISWEIN 1978	84-02-2072		84-02-29		TX-I-555	4970
AUSTRIAN PINOT BLANC	0354	8164	KABINETT	84-03-1684		84-03-02		TX-I-426	8726
BEERENAUSLESE	0054	8164	GEWURZTRAMINER WHITE	84-03-1681		84-03-02		TX-I-426	8731
GEWURZTRAMINER	0354	8164	DRY WHITE WINE	84-03-1678		84-03-02		TX-I-426	8732
GRUNVELTLINER	1154	8164	KABINETT	84-03-1683		84-03-02		TX-I-426	8727
PRIVATE RESERVE	0054	8164	RSLG SPATLESE-TROCKEN	84-03-1682		84-03-02		TX-I-426	8720
SCHLOSSWEIN	0054	8164	GRUNER VELTLINER-KABINETT	84-03-1685		84-03-02		TX-I-426	8735
SOMMERHOF WHITE	0054	8164	GRUNER VELTLINER-KABINETT	84-03-1686		84-03-02		TX-I-426	8733
RUSTER AUSLESE	7167	8164	WEISSBURGUNDER 1982	84-03-4099		84-03-02		KY-I-146	F-107
RUSTER SPATLESE	7167	8164	WELSCHRIESLING 1982	84-03-4100		84-03-02		KY-I-146	F-108
GUMPOLDSKIRCHNER	7229	8164	WHITE WINE 1982	84-03-4236		84-03-02		CA-I-2241	BW 22
GUMPOLDSKIRCHNER	0054	8164	DRY WHITE WINE KABINETT	84-03-1679		84-03-06		TX-I-426	8729
RIESLING	0354	8164	KABINETT	84-03-1680		84-03-06		TX-I-426	8726
BURGENLANDISCHER WINZER VER AN	0140	8164	GREEN STORK RUSTER GRUENER VLL	84-03-1823		84-03-06		NH-I-121	107
BURGENLANDISCHER WINZER VER AN	0140	8164	WHITE STORK RUSTER RIESLING	84-03-1830		84-03-06		NH-I-121	108
BURGENLANDISCHER WINZER VER AN	0140	8164	RUSTER AUSLESE WELSCHRIESLING	84-03-1828	T84-04-01	84-03-07		NH-I-121	115
BURGENLANDISCHER WINZER VER AN	0140	8164	ROSE STORCH	84-03-1825	T84-04-01	84-03-07		NH-I-121	111
BURGENLANDISCHER WINZER VERBAN	0147	8164	GOLDEN STORK RUSTER SPATLESE	84-03-1826	T84-04-01	84-03-07		NH-I-121	110
BURGENLANDISCHER WINZER VERBAN	0140	8164	RUSTER AUSLESE GEWURZTRAMINER	84-03-1829	T84-04-01	84-03-07		NH-I-121	116
BURGENLANDISCHER WINZER VERBAN	0141	8164	RUSTER BEERENAUSLESE	84-03-1824	T84-04-01	84-03-07		NH-I-121	112
BURGENLANDISCHER WINZER VERBAN	0140	8164	RUSTER TROCKENBEEREN AUSLESE	84-03-1827	T84-04-01	84-03-07		NH-I-121	113
WEISSBURGUNDER	9779	8164	TROCKEN	84-03-5595		84-03-07		PC-I-324	22784-1
DURNFERSKIRCHNER SONNENBERG	1323	8164	WELSCH-RSLG 1976	84-03-2410		84-03-08		TX-I-555	4876
PUSTAHOFEN	8123	8164	GRUNER VELTLINER KABINETT	84-03-4632	T84-06-15	84-03-09		CA-I-22	19
GUMPOLDSKIRCHNER	3672	8164	SPATLESE 1982	84-03-2739		84-03-12		IL-I-623	1206

DATE PREPARED: 09 JUL 84

BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS
CERTIFICATE OF LABEL APPROVAL (COLA) SYSTEM

BRAND NAME	VEND	C/T CODE	CLASS/TYPE (C/T) DESCRIPTION	DOCUMENT SERIAL NBR	CANCEL OR TEMP DATE	DATE OF APPROVAL FORM	PLANT OR PERMIT NBR	APPLICANT SERIAL NBR
GRUNER VELTLINER	3672	8164	AUSLESE-EISWEIN 1982	84-03-2990		84-03-12	IL-1-620	1205
KLOSTERKELLER SIEGENDORF	6234	8164	SAUVIGNON BLANC KABINETT	84-03-3822		84-03-19	MASS-1-122	3684
SPATROT ROTGIPFLER	9779	8164	GUMPOLDSKIRCHNER	84-03-5593		84-03-19	MC-1-324	31284-1
DEUTSCHKREUTZER GOLDBERG	9779	8164	WELSCHRIESLING	84-03-5592		84-03-20	MD-1-324	31284-4
MUSKAT OTTONEL	9779	8164	HERRENHAUS	84-03-5591		84-03-20	MD-1-324	31284-3
FELSER SCHILLINGSBERG	7135	8164	EISWEIN 1983	84-03-4083		84-03-21	ILL-1-446	PI G 0589
GRUENER VELTLINER	4995	8164	NIEDEROSTERREICH 1982	84-03-3431		84-03-23	GA-1-425	038
PINOT BLANC	4995	8164	NIEDEROSTERREICH 1982	84-03-3432		84-03-23	GA-1-425	007
TROCKENBEERENAUSLESE	4995	8164	GEWURZTRAMINER-BURGENLAND	84-03-3430		84-03-23	GA-1-425	039
WELSCHRIESLING	4995	8164	NIEDEROSTERREICH 1982	84-03-3433		84-03-23	GA-1-425	006
AUSTRIA	9622	8164	AUSTRIAN VELTLINER	84-03-5505		84-03-27	IL-1-596	CH-84-002
ORGINAL RUSTER	9622	8164	TROCKENBEERENAUSLESE WEISSBURG	84-03-5501		84-03-27	IL-1-596	CH-84-001
SCHLOSS-RAUER	9622	8164	VELTLINER	84-03-5503		84-03-27	IL-1-596	CH-84-005
SCHLOSS-RAUER	9622	8164	PINOT BLANC WHITE CABINETT	84-03-5499		84-03-27	IL-1-596	CH-84-006
SCHLOSS-RAUER	9622	8164	PINOT GRIS AUSLESE	84-03-5504		84-03-27	IL-1-596	CH-84-008
SCHLOSS-RAUER	9622	8164	RIESLING DRY WHITE	84-03-5502		84-03-27	IL-1-596	CH-84-004
SCHLOSS-RAUER	9622	8164	PINOT BLANC SPATLESE	84-03-5500		84-03-27	IL-1-596	CH-84-007
KREMSER SANDGRUBE	9779	8164	GRUNER VELTLINER	84-03-5594		84-03-28	MD-1-324	32284-9
1976 ST. MARTINUS-LUTHERWEI	1323	8164	WHITE TABLE WINE	84-04-2911		84-04-04	TX-1-555	4976
RUST NEUSIEDLERSEE	3559	8164	1981 SPATLESE RED WINE	84-04-3991		84-04-05	CT-1-173	84 12
RUSTER AUSLESE	5099	8164	1982 WHITE WINE	84-04-4812		84-04-05	DAL-1-115	3-1984
RUSTER SPATLESE	5099	8164	1982 WHITE WINE	84-04-4811		84-04-05	DAL-1-115	2-1984
RIESLING SYLVANER	1323	8164	WHITE QUALITY WINE	84-04-2910		84-04-11	TX-1-555	7282
ANDAUER KAISERGARTEN	7135	8164	1983 WHITE GRAPE WINE	84-04-5423		84-04-11	IL-1-446	WI-A-0077A
ZIMMERMANN-GRAFFE	9575	8164	WHITE AUSTRIAN WINE 1981	84-04-6853		84-04-11	MI-1-400	ZG-84-1
WALTHARI WEINKELLEREI	9587	8164	OSTERREICH 1980 GRUNER VELTLIN	84-04-6867		84-04-16	ILL-1-392	10-2
WALTHARI WEINKELLEREI	9587	8164	KONGSBRUNNER GRUNER VELTLINER	84-04-6866		84-04-16	ILL-1-392	10-3
KLOSTERKELLER LIEGENDORF	0966	8164	SCHLOSSWEIN DRY WHITE WINE	84-04-2794		84-04-17	NY-1-575	KS-10
KLOSTERKELLER LIEGENDORF WEING	0966	8164	SCHLOSSWEIN DRY RED WINE	84-04-2793		84-04-17	NY-1-575	KS-12
KLOSTERKELLER LIEGENDORF WEING	0966	8164	SCHLOSSWEIN DRY WHITE WINE	84-04-2792		84-04-17	NY-1-575	KS-13
KAISER-STUHL BRAND	6924	8164	1983 JOHANNISBERG RIESLING	84-04-5347		84-04-15	NY-1-615	657-A
JOHANNES EGBERTS	9575	8164	WHITE AUSTRIAN WINE 1982	84-04-6051		84-04-19	MI-1-400	JE-84-8
WEIN AUS OSTERREICH	9575	8164	RUSTER AUSLESE WHITE WINE	84-04-6849		84-04-19	MI-1-400	JE-84-9
ZIMMERMANN-GRAFFE	9575	8164	WHITE AUSTRIAN WINE 1982	84-04-6852		84-04-19	MI-1-400	ZG-84-33
BURGENLAND PINOT BLANC	7364	8164	KABINETT DRY WHITE WINE	84-04-5491		84-04-20	MC-1-242	1843
RIESLING KABINETT	7364	8164	DRY WHITE WINE	84-04-5489		84-04-20	MO-1-242	1839
RIESLING KABINETT	7364	8164	DRY WHITE WINE	84-04-5488		84-04-20	MO-1-242	1840
SCHLOSSWEIN KABINETT	7364	8164	DRY WHITE WINE	84-04-5490		84-04-20	MC-1-242	1838
WEIN AUS OSTERREICH	9575	8164	RUSTER SPATLESE WHITE WINE	84-04-6850		84-04-23	MI-1-400	DR-84-25
RUSTER MONCH	1261	8164	WELSCHRIESLING WHITE WINE	84-04-2474		84-04-24	CA-1-1479	727
KENESSEY	7426	8164	1983 DRY STILL WINE	84-04-5529		84-04-26	IL-1-678	006
KENESSEY	7426	8164	1983 MEDIUM DRY WINE	84-04-5528		84-04-26	IL-1-678	007
EDLER VON KREMS	7427	8164	WHITE QUALITY WINE	84-04-5531		84-04-26	IL-1-678	004
KENESSEY	7427	8164	1983 DRY STILL WINE	84-04-5530		84-04-26	IL-1-678	005
KENESSEY	7427	8164	1983 WHITE QUALITY WINE	84-04-5527		84-04-26	IL-1-678	009
CHATEAU LAFITE ROTHSCHILD	9633	8164	FRENCH RED TABLE WINE	84-04-6868		84-04-27	SF-1-654	P01349
OSTERREICH	9939	8164	WHITE TABLE WINE	84-05-5386		84-05-01	FL-1-553	WW-107
OSTERREICH	0060	8164	GRUNER VELTLINER 1980	84-05-1757		84-05-03	NJ-1-418	281 WA
GUMPOLDSKIRCHNER PINOT CHARDON	7427	8164	WHITE AUSTRIAN WINE	84-05-4597		84-05-07	IL-1-678	025
KREMSER AUSTRIAN RIESLING	7427	8164	WHITE QUALITY WINE	84-05-4602		84-05-07	IL-1-678	011
KREMSER GOLDBERG AUSLESE	7427	8164	WHITE QUALITY WINE	84-05-4599		84-05-07	IL-1-678	027
KREMSER JOHANNISBERG RIESLING S	7427	8164	WHITE QUALITY WINE	84-05-4592		84-05-07	IL-1-679	010
KREMSER JUNGFRAU	7427	8164	WHITE SPATLESE WINE	84-05-4603		84-05-07	IL-1-679	013
WEININGER	7427	8164	WHITE AUSTRIAN WINE	84-05-4598		84-05-07	IL-1-678	026
ST GEORGE BEERENAUSLESE	7427	8164	WHITE TABLE WINE	84-05-4600		84-05-07	IL-1-678	018

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ST GEORGE GEWURZTRAMINER	7427	8164	WHITE TABLE WINE	84-05-4596		84-05-07		IL-I-678	023
ST GEORGE MULLER-THURGAU	7427	8164	WHITE TABLE WINE	84-05-4589		84-05-07		IL-I-678	021
ST GEORGE MUSKAT-PITTOPED	7427	8164	WHITE TABLE WINE	84-05-4590		84-05-07		IL-I-678	022
ST GEORGE RIESLING	7427	8164	MED DRY WHITE TABLE WINE	84-05-4607		84-05-07		IL-I-678	019
ST GEORGE RIESLING SPATLESE	7427	8164	WHITE TABLE WINE	84-05-4593		84-05-07		IL-I-678	015
ST GEORGE TROCKENBEERENAUSLESE	7427	8164	WHITE TABLE WINE	84-05-4594		84-05-07		IL-I-678	016
ST GEORGE WELSCHRIESLING AUSLE	7427	8164	WHITE TABLE WINE	84-05-4605		84-05-07		IL-I-678	017
STRASSER DANUBE RIESLING	7427	8164	1983 WHITE MED DRY WINE	84-05-4603		84-05-07		IL-I-678	012
KREMSER JUNGFRAU GRUNER VELTLI	8680	8164	1981 WHITE WINE	84-05-5265		84-05-07		NY-I-449	293
KREMSER SCHMIDT	8680	8164	1981 WHITE WINE	84-05-5264		84-05-07		NY-I-449	294
PINOT CHARDONNAY	7427	8164	DRY SEC WHITE WINE	84-05-4595		84-05-08		IL-I-678	014
ST GEORGE RIESLING X SYLVANER	7427	8164	WHITE TABLE WINE	84-05-4591		84-05-08		IL-I-679	024
DONAUBURG	8661	8164	WHITE TABLE WINE	84-05-5255		84-05-09		IL-I-683	107
DUKATEN WEIN	8661	8164	WHITE TABLE WINE	84-05-5253		84-05-09		IL-I-683	105
FALKENSTEINER GRUNER VELTLINER	8661	8164	WHITE TABLE WINE	84-05-5254		84-05-09		IL-I-683	106
GUMPOLDSKIRCHNER	8661	8164	WHITE TABLE WINE	84-05-5256		84-05-09		IL-I-683	108
J. F. AHENS	9575	8164	1982 WHITE WINE	84-05-5853		84-05-09		MI-I-400	JFB-84-17
RUST NEUSIEDLERSEE	3559	8164	TROCKENBEERENAUSLESE 1981 .	84-05-2986		84-05-14		CT-I-173	84/31
ST. MARGARETHENER	3559	8164	WELSCHRIESLING BEERENAUSLESE	84-05-2985		84-05-14		CT-I-173	84/30
EISWEIN	4660	8164	RSLG AUSLESE	84-05-3392		84-05-14		MI-I-321	5984
ZIMMERMANN-GRAEFF	9575	8164	1982 WHITE WINE	84-05-5852		84-05-16		MI-I-400	ZG-23
KLOSTERNEUBURGER FENSTERL	3672	8164	GRUNER VELTLINER 1983	84-05-3034		84-05-18		IL-I-620	1265
GEWURZTRAMINER SPATLESE	8068	8164	1982 WHITE WINE	84-05-4855		84-05-23		IL-I-552	19084
KAISERGOLD AUSLESE	8068	8164	1982 WHITE WINE	84-05-4857		84-05-23		IL-I-552	19081
KAISERGOLD BEERENAUSLESE	8068	8164	1982 WHITE WINE	84-05-4858		84-05-23		IL-I-552	19080
KAISERGOLD TROCKENBEERENAUL SE	8068	8164	1982 WHITE WINE	84-05-4856		84-05-23		IL-I-552	19082
VIENNA	7427	8164	RIESLING MED DRY WHITE WINE	84-05-4600		84-05-30		IL-I-678	031
VIENNA	7427	8164	RIESLING DRY WHITE TABLE WINE	84-05-4601		84-05-30		IL-I-678	030
ST MARTINUS	1323	8164	1981 WHITE WINE	84-06-2358		84-06-07		TX-I-555	4314
GOTTWEIG	6661	8164	1983 RIESLING SYLVANER	84-06-4841		84-06-19		MD-I-334	OWBC-002-84
GOTTWEIG	6661	8164	1983 GREEN VELTLINER KREMS	84-06-4840		84-06-19		MD-I-334	OWBC-003-84
GOTTWEIG	6661	8164	1983 RHEIN RIESLING KREMS	84-06-4842		84-06-19		MD-I-334	OWBC-001-84
BREITENBRUNNER	7135	8164	BURGENLAND BEERENAUS	84-06-5123		84-06-26		ILL-I-446	PI-A-0606
SCHLOSS RIEGERSBURG	4933	8164	1982 WEISSBURGUNDER PINT BLANC	84-06-4060		84-06-27		CG-I-234	103-84
SCHWEGMANN	5507	8164	NEUBURGER SPATLESE 1981	84-06-4488	T84-09-29	84-06-27		LA-I-296	016
SCHWEGMANN	5507	8164	WELSCHRIESLING 1982	84-06-4485	T84-09-29	84-06-27		LA-I-296	020
SCHWEGMANN	5507	8164	NEUBURGER KABINETT 1981	84-06-4486	T84-09-29	84-06-27		LA-I-296	018
SCHWEGMANN	5507	8164	MULLER THURGAU 1981	84-06-4487	T84-09-29	84-06-27		LA-I-296	017
WEIDENER KAISERGARTEN	7135	8164	1981 BURGENLAND TRUCKENBEERAUS	84-06-5124		84-06-27		ILL-I-446	PI-A-0608
ZWEIKREUZGARTEN	0966	8164	PINOT CHARDONNAY TBLE WN	84-07-1758	T84-10-10	84-07-11		NY-I-575	JJ14
FALKENSTEINER	0654	8164	WHITE WINE	84-07-1558		84-07-16			BAB-6
RUSTER AUSLESE	0654	8164	WHITE WINE	84-07-1557		84-07-16		CA-P-4440	BAB-5
RUSTER MONCH	0654	8164	WHITE WINE	84-07-1560		84-07-16		CA-P-4440	BAB-1
RUSTER SPATLESE	0654	8164	WHITE WINE	84-07-1559		84-07-16		CA-P-4440	BAB-3
RUSTER BEERENAUSLESE	7135	8164	WHITE GRAPE WINE	84-07-4862		84-07-16		ILL-I-446	PI-A-0613
TRAUSDORFER TROCKENBEERENAUSLE	7135	8164	WHITE GRAPE WINE	84-07-4863		84-07-16		ILL-I-446	WD-A-0068
OSBERGER	8058	8164	AUSTRIA WINE 1983	84-07-5429		84-07-18		IL-I-552	19083
RIESLING	1219	8164	VIENNA WHITE BRAND	84-07-1413		84-07-24		TX-I-249	I-2451
MULLER THURGAU	5507	8164	WHITE WINE	84-07-3853		84-07-24		LA-I-296	031
MULLER THURGAU	5507	8164	WHITE WINE	84-07-3852		84-07-24		LA-I-296	030
NEUBURGER KABINETT	5507	8164	WHITE WINE	84-07-3851	T84-10-24	84-07-24		LA-I-296	029
NEUBURGER KABINETT	5507	8164	WHITE WINE	84-07-3850		84-07-24		LA-I-296	028
NEUBURGER SPATLESE	5507	8164	WHITE WINE	84-07-3855		84-07-24		LA-I-296	033
NEUBURGER SPATLESE	5507	8164	WHITE WINE	84-07-3854	T84-10-24	84-07-24		LA-I-296	032
RAMADA HOTEL WEST	1323	8164	WHITE WINE	84-08-2369	T84-11-01	84-08-01		TX-I-555	46822

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KLOSTERKELLER SIEGENDORF	7366	8164	BURGENLAND PINOT BLANC WHT WN	84-08-5527		84-08-02	MD-1-242	1866
KLOSTERKELLER SIEGENDORF	7366	8164	RIESLING DRY WHITE WINE	84-08-5526		84-08-02	MD-1-242	1865
KLOSTERKELLER SIEGENDORF	7366	8164	RIESLING WHITE WINE	84-08-5525		84-08-02	MD-1-242	1864
SCHLOSSWEIN	7366	8164	DRY WHITE WINE	84-08-5524		84-08-02	MD-1-242	1863
BEERENAUSLESE	9622	8164	WHITE QUALITY WINE	84-08-6805		84-08-02	IL-1-596	CH-84-26
SCHLOSS RAUER	9622	8164	WHITE QUALITY WINE	84-08-6804		84-08-02	IL-1-596	CH-84-25
SCHLOSS RAUER	9622	8164	WHITE QUALITY WINE	84-08-6803		84-08-02	IL-1-596	CH-84-27
TROCKENBEERENAUSLESE	9622	8164	WHITE QUALITY WINE	84-08-6808		84-08-02	IL-1-596	CH-84-31
TROCKENBEERENAUSLESE	9622	8164	WHITE QUALITY WINE	84-08-6807		84-08-02	IL-1-596	CH-84-30
TROCKENBEERENAUSLESE	9622	8164	WHITE QUALITY WINE	84-08-6806		84-08-02	IL-1-596	CH-84-29
SCHLOSS RAUER	9622	8164	WHITE QUALITY WINE	84-08-6802		84-08-03	IL-1-596	CH-84-28
CHARDONNAY KABINETT	1332	8164	DRY WHITE WINE	84-08-2844		84-08-06	9-1-254	84-159
GRUNVELTLINER	1332	8164	DRY WHITE WINE	84-08-2843		84-08-06	9-1-254	84-160
KLOSTERKELLER SIEGENDORF	1332	8164	DRY WHITE WINE	84-08-2846		84-08-06	9-1-254	84-162
KLOSTERKELLER SIEGENDORF	1332	8164	BURGENLAND PINOT BLANC	84-08-2845		84-08-06	9-1-254	84-158
KREMSER GRUNER VELTLINER	3316	8164	WHITE TABLE WINE	84-08-6315		84-08-13	CO-1-263	0-3-1
OESTERREICHISCHER HERRSCHAFTSWE	6184	8164	SAUVIGNON BLANC	84-08-3737		84-08-15	TX-1-576	23
TUSSNITZFRAGEN BURGERSTEIN	7229	8164	AUSTRIAN WHITE WINE	84-08-5430		84-08-16	CA-1-2241	TSCH-2
VELTLINER	7229	8164	CLEAR CRISP AND DRY WINE	84-08-5431		84-08-16	CA-1-2241	TSCH-4
APETLONER BEERENAUSLESE	0682	8164	1982 WHITE WINE	84-08-1937		84-08-24	WIS-1-279	66
ZIMMERMANN GRAFFE	0682	8164	1982 WHITE AUSLESE WINE	84-08-1936		84-08-24	WIS-1-279	67
ZIMMERMANN GRAFFE	0682	8164	1982 WHITE WINE	84-08-1938		84-08-24	WIS-1-279	68
EISWEIN	9352	8164	WHITE WINE	84-08-6762		84-08-24	I-1-13	510
GUMPOLDSKIRCHNER	9352	8164	DRY WHITE WINE	84-08-6761		84-08-24	I-1-13	509
KLOSTERKELLER SIEGENDORF	9352	8164	BURGENLAND RIESLING DRY WHITE	84-08-6760		84-08-24	I-1-13	508
KLOSTERKELLER SIEGENDORF	9352	8164	WHITE WINE	84-08-6765		84-08-24	I-1-13	513
KLOSTERKELLER SIEGENDORF	9352	8164	DRY WHITE WINE	84-08-6766		84-08-24	I-1-13	514
KLOSTERKELLER SIEGENDORF	9352	8164	PINOT BLANC DRY WHITE WINE	84-08-6759		84-08-24	I-1-13	507
TROCKENBEERENAUSLESE	9352	8164	WHITE WINE	84-08-6763		84-08-24	I-1-13	511
FERDINAND PIEROTH	7135	8164	WHITE GRAPE WINE	84-08-5400		84-08-28	ILL-1-446	PI-G-0622
FERDINAND PIEROTH	7135	8164	WHITE GRAPE WINE	84-08-5399		84-08-28	ILL-1-446	PI-A-0619
FERDINAND PIEROTH	7135	8164	WHITE GRAPE WINE	84-08-5398		84-08-28	ILL-1-446	PI-A-620
RUSTER AUSLESE	5282	8164	WHITE WINE 1982	84-09-0508		84-09-06	IN-1-373	0009
RUSTER SPATLESE	5282	8164	WHITE WINE 1982	84-09-0510		84-09-06	IN-1-373	0011
RUST NEUSIEDLERSEE	8603	8164	TROCKENBEERENAUSLESE 1981	84-09-1358		84-09-11	CT-1-174	96-84
ST. MARGARETHENER	8603	8164	AUSLESE 1982	84-09-1357		84-09-11	CT-1-174	95-84
PINOT BLANC-KABINETT	7229	8164	WHITE WINE 1983	84-09-1976		84-09-12	CA-1-2241	MACH 1
RUST NEUSIEDLERSEE	1559	8164	TROCKENBEERENAUSLESE 1981	84-09-2269		84-09-13	CT-1-173	84-95
GRAND IMPERIAL BARON GEORGE	1557	8164	RIESLING MED. DRY	84-09-2423		84-09-14	PHI-1-53	AUS-08
GRAND IMPERIAL BARON GEORGE	1557	8164	SAUVIGNON BLANC	84-09-2424		84-09-14	PHI-1-53	AUS-09
GRAND IMPERIAL BARON GEORGE	1557	8164	VELTLINER DRY	84-09-2422		84-09-14	PHI-1-53	AUS-07
GRAND IMPERIAL BARON GEORGE	1557	8164	BEERENAUSLESE	84-09-2418		84-09-14	PHI-1-53	AUS-03
GRAND IMPERIAL BARON GEORGE	1557	8164	TROCKENBEERENAUSLESE	84-09-2417		84-09-14	PHI-1-53	AUS-02
GRAND IMPERIAL BARON GEORGE	1557	8164	RIESLING AUSLESE	84-09-2420		84-09-14	PHI-1-53	AUS-05
GRAND IMPERIAL BARON GEORGE	1557	8164	SPATLESE	84-09-2425		84-09-14	PHI-1-53	AUS-10
GRAND IMPERIAL BARON GEORGE	1557	8164	PINOT CHARDONNAY	84-09-2419		84-09-14	PHI-1-53	AUS-04
GRAND IMPERIAL BARON GEORGE	1557	8164	GEWURZTRAMINER	84-09-2421		84-09-14	PHI-1-53	AUS-06
RUHIVERTRAUBE	6184	8164	SPATLESE	84-09-2615		84-09-17	TX-1-576	22
GRUNER VELTLINER	8603	8164	WHITE WINE	84-09-3443		84-09-20	CT-1-174	99-84
MULLER THURGAU	8603	8164	WHITE WINE	84-09-3444		84-09-20	CT-1-174	100-84
BURGENLAND JOHANNISBERG RSLG	0789	8164	RHEINRIESLING SPATLESE	84-09-3672		84-09-21	CO-1-244	88-1063
BURGENLAND PINOT BLANC	0789	8164	KABINETT	84-09-3687		84-09-21	CO-1-244	88 1070
BURGENLAND RIESLING	0789	8164	KABINETT	84-09-3671		84-09-21	CO-1-244	88-1064
BURGENLAND RIESLING	0789	8164	KABINETT	84-09-3683		84-09-21	CO-1-244	88 1068
EISWEIN	1749	8164	RSLG AUSLESE	84-09-3673		84-09-21	CO-1-244	88-1061

BRAND NAME	VFAD	C/T CODE	CLASS/TYPE (C/T) DESCRIPTION	DOCUMENT SERIAL NBR	CANCEL OR TEMP DATE	DATE OF APPROVAL	FORM	PLANT OR PERMIT NBR	APPLICANT SERIAL NBR
GEWURZTRAMINER	0789	8164	AUSLESE	84-09-3680		84-09-21		CC-I-244	BB 1071
GEWURZTRAMINER	0789	8164	KABINETT	84-09-3675		84-09-21		CO-I-244	BB-1062
PRIVATE RESERVE	0789	8164	DRY WHITE WINE	84-09-3676		84-09-21		CC-I-244	BB-1067
SCHLOSSWEIN	0789	8164	DRY WHITE WINE	84-09-3670		84-09-21		CC-I-244	BB-1065
SCHLOSSWEIN	0789	8164	DRY WHITE WINE	84-09-3669		84-09-21		CC-I-244	BB-1066
TROCKENBEERENAUSLESE	0789	8164	AUSTRIAN PINOT BLANC	84-09-3688		84-09-21		CC-I-244	BB 1069
VIENNA WHITE BRAND	0219	8164	AUSLESE	84-09-4356		84-09-26		TX-I-249	1-2495
ST. MARGARETHENER	8603	8164	BEERENAUSLESE 1981	84-09-4394		84-09-26		CT-I-174	94-84
OSTERREICH	0400	8164	GRUNER VELTLINER 1980	84-09-4737		84-09-28		NJ-I-418	6594-WA
THE PLAZA	0966	8164	BURGENLAND PINOT BLANC-KABINET	84-09-4873		84-09-28		Y-I-575	KS16
DONNERSKIRCHNER SONNENBERG	7938	8164	TROCKENBEERENAUSLESE	84-10-0328		84-10-02		-I-743	0099
BEERENAUSLESE	4790	8164	WHITE WINE 1976	84-10-0785		84-10-04		NH-I-121	211
BURGENLAND PINOT BLANC	4790	8164	KABINETT 1983	84-10-0790		84-10-04		NH-I-121	206
BURGENLAND PINOT NOIR	4790	8164	BLAUBURGUNDER SPATLESE 1981	84-10-0791		84-10-04		NH-I-121	205
BURGENLAND RIESLING	4790	8164	KABINETT 1983	84-10-0792		84-10-04		NH-I-121	204
BURGENLAND RIESLING	4790	8164	KABINETT 1983	84-10-0789		84-10-04		NH-I-121	207
GEWURZTRAMINER	4790	8164	KABINETT 1981	84-10-0788		84-10-04		NH-I-121	238
GEWURZTRAMINER	4790	8164	AUSLESE 1981	84-10-0786		84-10-04		NH-I-121	210
GRUNVELTLINER	4790	8164	KABINETT 1983	84-10-0794		84-10-04		NH-I-121	202
JOHANNISBERG RIESLING	4790	8164	RHEINRIESLING SPATLESE 1983	84-10-0793		84-10-04		NH-I-121	203
PRIVATE RESERVE	4790	8164	DRY WHITE WINE 1983	84-10-0787		84-10-04		NH-I-121	209
PRIVATE RESERVE	4790	8164	DRY RED WINE 1981	84-10-0784		84-10-04		NH-I-121	212
TROCKENBEERENAUSLESE	4790	8164	PINOT BLANC 1981	84-10-0795		84-10-04		NH-I-121	201
SCHWEGMANN	5507	8164	WELSCHRIESLING 1982	84-10-1022		84-10-05		LA-I-296	021
SCHWEGMANN	5507	8164	WELSCHRIESLING 1982	84-10-1021		84-10-05		LA-I-296	020
GUMPOLDS KIRCHNER	0219	8164	SPATLESE	84-10-1528		84-10-09		TX-I-249	1-2504
ST. MARGARETHENER	3559	8164	BEERENAUSLESE 1982	84-10-1531		84-10-09		CT-I-173	84-54
RUSTER AUSLESE	7147	8164	WEISSBURGUNDER 1982	84-10-1817		84-10-10		KY-I-346	S-111
BURGENLAND PINOT BLANC	0966	8164	KABINETT	84-10-2911		84-10-16		NY-I-575	KS17
OSBERGER	8068	8164	KAISERGOLD SPATLESE 1982	84-10-3066		84-10-17		IL-I-552	19087
SCHLOSS GRAFFENEGG	6366	8164	KREMSER SPATLESE 1979 WHITE	84-10-4284		84-10-18		GA-I-296	GE 455
SCHLOSS RIEGERSBURG	6366	8164	WELSCHRIESLING 1982	84-10-4282		84-10-18		GA-I-296	GE 457
SCHLOSS RIEGERSBURG	6366	8164	WEISSBURGUNDER PINOT BLANC	84-10-4283		84-10-18		GA-I-296	GE 456
FALKENSTEINER	9480	8164	GRUNER VELTLINER 1982	84-10-4216		84-10-18		CHI-I-69	V.W.I.I. 861
RUST NEUSIEDLERSEE	9480	8164	TROCKENBEERENAUSLESE 1981	84-10-4213		84-10-18		CHI-I-69	V.W.I.I. 863
ST. MARGARETHENER AUSLESE	9480	8164	WELSCHRIESLING 1982	84-10-4196		84-10-18		CHI-I-69	V.W.I.I. 859
ST. MARGARETHENER BEERENAUS ES	9480	8164	WELSCHRIESLING 1983	84-10-4195		84-10-18		CHI-I-69	V.W.I.I. 860
WEISSE KATZ	0782	8164	GRUNER VELTLINER 1980	84-10-4566		84-10-19		IL-I-682	84-2000
OSTERREICH KLOSTERNEUBURGER	0782	8164	GRUNER VELTLINER 1980	84-10-5496		84-10-24		IL-I-682	84-2005
BEERENAUSLESE AUSTRIAN PINOT B	5294	8164	WHITE AUSTRIAN WINE	84-10-5231		84-10-24		MI-I-447	PNVW 1141
BURGENLAND RIESLING KABINETT	5294	8164	WHITE AUSTRIAN WINE	84-10-5230		84-10-24		MI-I-447	PNVW 1146
ST. GEORGENER SPATLESE	7938	8164	WHITE WINE	84-10-5216		84-10-24		FL-I-743	0101
OSTERREICH KONIGSBRUNNER	0782	8164	GRUNER VELTLINER 1980	84-10-5820		84-10-25		IL-I-692	84-2007
OSTERREICH NUSSDORFER	0782	8164	GRUNER VELTLINER 1980	84-10-5819		84-10-25		IL-I-682	84-2036
GEWURZ-TRAMINER	4319	8164	WHITE WINE 1982	84-11-0573		84-11-01		VA-I-360	4792
OGGAUER WELSCHRIESLING	4319	8164	WHITE WINE 1982	84-11-0570		84-11-01		VA-I-360	4795
STEINRIEGEL	4319	8164	MUSKAT OTTONEL 1982	84-11-0572		84-11-01		VA-I-360	4793
TRAMINER SPATLESE	4319	8164	WHITE WINE 1982	84-11-0574		84-11-01		VA-I-360	4791
BURGENLAND PINOT BLANC	9751	8164	KABINETT	84-11-0099		84-11-01		VT-I-126	84108
GEWURZTRAMINER	9751	8164	AUSLESE	84-11-0096		84-11-01		VT-I-126	84101
GRUNVELTLINER	9751	8164	KABINETT DRY WHITE	84-11-0097		84-11-01		VT-I-126	84105
JOHANNISBERG RIESLING	9751	8164	RHEINRIESLING SPATLESE	84-11-0159		84-11-01		VT-I-126	84107
JOHANNISBERG RIESLING	9751	8164	RHEINRIESLING KABINETT	84-11-0098		84-11-01		VT-I-126	84106
PINOT BLANC	9751	8164	KABINETT DRY WHT WINE	84-11-0106		84-11-01		VT-I-126	84116
PINOT BLANC	9751	8164	KABINETT DRY WHT WINE	84-11-0107		84-11-01		VT-I-126	84117

DATE PREPARED: 29 JUL 86

BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS
CERTIFICATE OF LABEL APPROVAL (COLA) SYSTEM

BRAND NAME	V NO	C/T CODE	CLASS/TYPE (C/T) DESCRIPTION	DOCUMENT SERIAL NBR	CANCEL OR TEMP DATE	DATE OF APPROVAL	FORM	PLANT OR PERMIT NBR	APPLICANT SERIAL NBR
PRIVATE RESERVE	9751	8164	DRY WHITE WINE	84-11-0093		84-11-01		VT-I-126	84103
TRAPP FAMILY LODGE	9751	8164	DRY WHITE WINE	84-11-0101		84-11-01		VT-I-126	84110
TRAPP FAMILY LODGE	9751	8164	DRY WHITE WINE	84-11-0100		84-11-01		VT-I-126	84109
TROCKENBEERENAUSLESE	9751	8164	BURGENLAND PINOT BLANC	84-11-0094		84-11-01		VT-I-126	84104
PINOT CHARDONNAY	1557	8164	GRINZINGER NUSSBERGER DRY SEC	84-11-1643		84-11-02		PHI-I-93	AU-10-2-30
KREMSER PINOT BLANC	8265	8164	WHITE WINE	84-11-1120		84-11-05		TX-I-530	SW841031074
KREMSER RIESLING	8265	8164	WHITE WINE	84-11-1119		84-11-05		TX-I-530	SW841031072
KREMSER RIESLING	8265	8164	WHITE WINE	84-11-1121		84-11-05		TX-I-530	SW841031073
DONNERSKIRCHNER SONNENBERG	9753	8164	TROCKENBEERENAUSLESE 1976	84-11-2504		84-11-07		NY-I-945	7
KIRCHENGARTEN WOSENDORF/WACHAU	3751	8164	RSLG KABINETT 1983	84-11-2503	T85-02-07	84-11-07		NY-I-945	5
KREMSER PINOT BLANC	9753	8164	WEISSER BURGUNDER	84-11-2501		84-11-07		NY-I-945	4
RIED STEINRIEGL	9753	8164	WACHAUER GRUNER VELTLINER	84-11-2502		84-11-07		NY-I-945	6
RUSTER AUSLESE	9753	8164	WELSCHRIESLING	84-11-2451		84-11-07		NY-I-945	9
RUSTER TROCKENBEERENAUSLESE	9753	8164	AUSLESE	84-11-2499		84-11-07		NY-I-945	8
KLOSTERKELLER SIEGENDORF	9552	8164	BURGENLAND GRUNVELTLINER	84-11-4435		84-11-19		I-I-13	758
KLOSTERKELLER SIEGENDORF	9552	8164	BURGENLAND MULLER THURGAU	84-11-4436		84-11-19		I-I-13	759
KLOSTERKELLER SIEGENDORF	9552	8164	BEERENAUSLESE GEWURZTRAMINER	84-11-4434		84-11-19		I-I-13	757
KLOSTERKELLER SIEGENDORF	9552	8164	GEWURZTRAMINER AUSLESE	84-11-4437		84-11-19		I-I-13	760
RUSTER AUSLESE	0654	8164	PINOT BLANC 1983	84-11-4938		84-11-20		CA-P-4440	BAB-10
RUSTER MONCH	0654	8164	WELSCHRIESLING 1983	84-11-4936		84-11-20		CA-P-4440	BAB-7
RUSTER SPATLESE	0654	8164	GEWURZTRAMINER 1982	84-11-4846		84-11-20		CA-P-4440	BAB-12
PRINZ VON ANHALT	8068	8164	RIESLING KABINETT 1982	84-11-5725		84-11-26		IL-I-552	11199
RUSTER AUSLESE	7147	8164	WEISSBURGUNDER 1982	84-11-6012		84-11-27		KY-I-346	N-103
KLOSTERKELLER SIEGENDORF	2152	8164	1982 EISWEIN RIESLING AUS	84-11-6462		84-11-28		C-I-362	KS-5
KLOSTERKELLER SIEGENDORF	2152	8164	1982 PINOT BLANC KAB	84-11-6466		84-11-28		C-I-362	KS-1
KLOSTERKELLER SIEGENDORF	2152	8164	1982 JOHANNISBERG RIESLING	84-11-6457		84-11-28		NC-I-362	KS-20
KLOSTERKELLER SIEGENDORF	2152	8164	PINOT BLANC TROCKENBEERENAUSLESE	84-11-6463		84-11-28		C-I-362	KS-14
KLOSTERKELLER SIEGENDORF	2152	8164	1982 PINOT BLANC KAB	84-11-6467		84-11-28		C-I-362	KS-8
KLOSTERKELLER SIEGENDORF	2152	8164	1982 GEWURZTRAMINER KAB ESTATE	84-11-6456		84-11-28		NC-I-362	KS-18
KLOSTERKELLER SIEGENDORF	2152	8164	1982 GEWURZTRAMINER AUS ESTATE	84-11-6460		84-11-28		NC-I-362	KS-17
KLOSTERKELLER SIEGENDORF	2152	8164	1982 CHARDONNAY KAB	84-11-6473		84-11-28		NC-I-362	KS-11
KLOSTERKELLER SIEGENDORF	2152	8164	1982 JOHANNISBERG RIESLING	84-11-6459		84-11-28		NC-I-362	KS-16
KLOSTERKELLER SIEGENDORF	2152	8164	1982 CHARDONNAY KAB	84-11-6525		84-11-28		NC-I-362	KS-12
KLOSTERKELLER SIEGENDORF	2152	8164	1982 MULLER THURGAU KAB	84-11-6464		84-11-28		NC-I-362	KS-13
KLOSTERKELLER SIEGENDORF	2152	8164	1982 RIESLING KAB	84-11-6474		84-11-28		NC-I-362	KS-10
KLOSTERKELLER SIEGENDORF	2152	8164	1982 GRUNER VELTLINER KAB	84-11-6465		84-11-28		NC-I-362	KS-2
KLOSTERKELLER SIEGENDORF	2152	8164	1982 PINOT BLANC WEISSBURGUNDER	84-11-6470		84-11-28		NC-I-362	KS-7
KLOSTERKELLER SIEGENDORF	2152	8164	DRY GUMPOLDSKIRCHNER KAB	84-11-6472		84-11-28		NC-I-362	KS-9
RUSTER AUSLESE	4158	8164	PINOT BLANC 1983	84-12-0224		84-12-03		CA-I-2834	J.A.I. 17
RUSTER MONCH	4158	8164	GRUNER VELTLINER 1983	84-12-0024		84-12-03		CA-I-2834	JAI 15
RUSTER MONCH	4158	8164	WELSCHRIESLING	84-12-0023		84-12-03		CA-I-2834	J.A.I. 14
HOUSE OF AUSTRIA	8265	8164	RSLG SYLVANER	84-12-3155		84-12-03		TX-I-530	SW84-1120117
LIEBFRAUENKLOSTER	8068	8164	WACHAU RSLG 1983	84-12-3077		84-12-12		IL-I-552	11197
SCHWARZE KATZCHEN	8068	8164	GRUNER VELTLINER 1983	84-12-3363		84-12-12		IL-I-552	11217
KAISER F. JOSEF	7752	8164	SPATLESE 1983	84-12-3676	T85-03-17	84-12-17		2-I-29	591
HAKKE ALTES WEINHAUS	2462	8164	FALKENSTEINER 1983	84-12-4324	T85-03-23	84-12-20		BW-78-LM	210
BADENER GEWURZTRAMINER	1688	8164	AUSLESE	84-12-4286		84-12-21		WA-I-982	003 W
BADENER MUSKAT OTTONEL	1683	8164	WHITE WINE	84-12-4285		84-12-21		WA-I-982	002 W
FALKENSTEINER	1684	8164	GRUNER VELTLINER	84-12-4287		84-12-21		WA-I-982	004 W
GUMPOLDSKIRCHNER	1688	8164	NEUBURGER SPATLESE	84-12-4284		84-12-21		WA-I-982	001 W
WOLKERSDORFER WEISSER BURGUNDER	1683	8164	KABINETT	84-12-4283		84-12-21		WA-I-982	005 W
STRASSER	3255	8164	RIESLING	84-12-4431		84-12-21		TX-I-530	SW84-1120116
STRASSER	8256	8164	GRUNER VELTLINER	84-12-4433		84-12-21		TX-I-533	SW84-1214142
KLOSTERKELLER SIEGENDORF	5791	8164	EISWEIN 1976	84-12-4957		84-12-28		NM-I-121	213
KLOSTERKELLER SIEGENDORF	5791	8164	PINOT NOIR 1981	84-12-4955		84-12-28		NM-I-121	215

BRAND NAME	VEND	C/T CODE	CLASS/TYPE (C/T) DESCRIPTION	DOCUMENT SERIAL NBR	CANCEL OR TEMP DATE	DATE OF APPROVAL	FORM	PLANT OR PERMIT NBR	APPLICANT SERIAL NBR
KLOSTERKELLER SIEGENDORF	4793	8164	MULLER THURGAU KABINETT 1983	84-12-4956		84-12-28		NH-I-121	214
GOLDEN STORK	3265	8164	RUSTER SPATLESE	85-01-3366		85-01-31		TX-I-533	SW84-1227148
WHITE STORK	3265	8164	RUSTER RIESLING	85-01-3364		85-01-31		TX-I-510	SW84-1227150
SCHLOSSWEIL	3265	8164	NEUBURGER	85-01-3071		85-01-17		TX-I-533	SW84-1227147
MUNCHHOFER SPATLESE	7135	8164	RED WINE 1983	85-01-2042		85-01-16		ILL-I-446	WD-A-0105
GUMPOLDSKIRCHNER	3265	8164	PINOT CHARDONNAY	85-01-2252		85-01-17		TX-I-510	SW84-0110157
ILLMITZER HOLLENPFAD	7135	8164	RULANDER TROCKENBEERENAUSLESE	85-01-4061		85-01-31		ILL-I-446	WD-A-0108
EDELSTALER KUPFERHOHE	7135	8164	GEWURZTRAMINER EISWEIN 1980	85-02-0261		85-02-05		ILL-I-446	PI-G-0640
MUNCHHOFER GOLDTREPPE	7135	8164	RULANDER EISWEIN 1980	85-02-0263		85-02-05		ILL-I-446	WI-A-0110
MUNCHHOFER STEINGANG	7135	8164	TROCKENBEERENAUSLESE 1980	85-02-0265		85-02-05		ILL-I-446	PI-G-0641
SCHLOSSADLER	8123	8164	MUNCHHOFER PUSZTABLUT	85-02-1202		85-02-11		CA-I-2282	22
SCHLOSSADLER	8123	8164	GUMPOLDSKIRCHNER ZIERFANDLER	85-02-2543		85-02-14		CA-I-22	23
THREE MONKS	7502	8164	FALKENSTEINER 1983	85-02-2875		85-02-20		CIA-I-166	R-501
AUSTRIAN PINOT BLANC	5077	8164	WHITE WINE	85-02-3312		85-02-22		UT-I-762	85105
BEERENAUSLESE	5077	8164	GEWURZTRAMINER	85-02-3314		85-02-22		UT-I-762	85102
EISWEIN	5077	8164	BSLG AUSLESE	85-02-3323		85-02-22		UT-I-762	85110
GEWURZTRAMINER	5077	8164	KABINETT	85-02-3318		85-02-22		UT-I-762	85106
JOHANNISBERG RIESLING	5077	8164	RHEINRIESLING SPATLESE	85-02-3319		85-02-22		UT-I-762	85107
RIESLING	5077	8164	KABINETT	85-02-3316		85-02-22		UT-I-762	85103
SCHLOSSWEIN	5077	8164	GRUNER VELTLINER KABINETT	85-02-3315		85-02-22		UT-I-762	85102
TROCKENBEERENAUSLESE	5077	8164	AUSTRIAN PINOT BLANC	85-02-3317		85-02-22		UT-I-762	85104
GRUNER VELTLINER	4995	8164	OSTERREICH WHITE WINE	85-03-1634		85-03-06		GA-I-425	011
OSTERREICH	4995	8164	WELSCHRIESLING SPATLESE	85-03-0638		85-03-06		GA-I-425	015
LENZ MOSER	1787	8164	BLUE DANUBE 1983	85-03-1955		85-03-11			1950
LENZ MOSER	1787	8164	GRUNER VELTLINER	85-03-1954		85-03-11			1983
LENZ MOSER	1787	8164	PINOT BLANC	85-03-1953		85-03-11			1957
APETLONER BEERENAUSLESE	9575	8164	WHITE WINE 1982	85-03-1854		85-03-11		MI-I-400	ZG-84-49
RUSTER SPATLESE	9575	8164	WELSCHRIESLING 1982	85-03-1861		85-03-11		MI-I-400	ZG-16
SCHLOSS BAUER	9622	8164	AUSBRUCH MUSKAT OTTONEL	85-03-1192		85-03-12		IL-I-596	CH-85-003
SCHLOSS BAUER	9622	8164	AUSLESE GEWURZTRAMINER	85-03-1195		85-03-12		IL-I-596	CH-85-005
SCHLOSS BAUER	9622	8164	SPAETLESE WEISSBURGUNDER	85-03-1191		85-03-12		IL-I-596	CH-85-004
SCHLOSS BAUER	9622	8164	AUSLESE WEISSBURGUNDER	85-03-1193		85-03-12		IL-I-596	CH-85-007
SCHLOSS BAUER	9622	8164	RHEINRIESLING SPAETLESE	85-03-1194		85-03-12		IL-I-596	CH-85-006
RUST NEUSIEDLERSEE	1559	8164	B. AUFRANKISCH SPATLESE 1981	85-03-2018		85-03-13		CI-I-173	16/95
EDELSTALER KUPFERHOHE	7135	8164	EISWEIN 1980	85-03-3869		85-03-20		ILL-I-446	PI-A-0664
LENZ MOSER	1787	8164	WELSCHRIESLING 1983	85-03-3794		85-03-21		GA-I-429	1916
ST. MARGARETH GOLD	7229	8164	BSLG SPATLESE 1983	85-03-4041		85-03-22		CA-I-2241	SM 4
ST. MARGARETH GOLD	7229	8164	GEWURZTRAMINER SPATLESE 1981	85-03-4038		85-03-22		CA-I-2241	SM 1
ST. MARGARETH GOLD	7229	8164	ROSE KABINETT 1983	85-03-4040		85-03-22		CA-I-2241	SM 3
ST. MARGARETH GOLD	7229	8164	BSLG KABINETT 1983	85-03-4039		85-03-22		CA-I-2241	SM 2
RUST NEUSIEDLERSEE	7135	8164	BEERENAUSLESE 1979	85-03-4387		85-03-26		ILL-I-446	WD-A-0149
FALKENSTEINER	9341	8164	WHITE WINE 1983	85-03-4200		85-03-27		MI-I-540	H-251
WEISSE KATZ	0662	8164	WHITE WINE 1980	85-03-5272		85-03-28		NJ-I-456	RIS-01-325-1
RUSTER AUSLESE	1574	8164	WHITE WINE 1980	85-03-5180		85-03-28		OH-I-572	2258
ST. GEORGENER SPATLESE	1574	8164	WHITE WINE 1980	85-03-5179		85-03-28		OH-I-572	2259
HANS CHRISTIAN	2331	8164	FALKENSTEINER 1983	85-04-0525		85-04-02		OH-I-539	D-301
THREE MONKS	2331	8164	FALKENSTEINER 1983	85-04-0524		85-04-02		OH-I-539	D-302
HANS CHRISTIAN	4759	8164	FALKENSTEINER 1983	85-04-0161		85-04-02		IA-I-377	K-101
THREE MONKS	4759	8164	FALKENSTEINER 1983	85-04-0162		85-04-02		IN-I-377	K-102
GEWURZ TRAMINER	4319	8164	WHITE WINE	85-04-1821		85-04-09		VA-I-360	4801
GRUNER HUSAR	4319	8164	GRUNER VELTLINER	85-04-1817		85-04-09		VA-I-360	4805
HUMMELBERG	4319	8164	WELSCH RIESLING	85-04-1823		85-04-09		VA-I-363	4802
UNGARNER WELSCHRIESLING	4319	8164	WHITE WINE	85-04-1857		85-04-09		VA-I-369	4806
STEINRIEGEL	4319	8164	MUSKAT OTTONEL	85-04-1818		85-04-09		VA-I-369	4804
WEISSBURGUNDER	4319	8164	PINOT BLANC DRY	85-04-1822		85-04-09		VA-I-360	4800

BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS
CERTIFICATE OF LABEL APPROVAL (COLA) SYSTEM

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WEISSER MUSAK	4319	8164	MULLER THURGAU	85-04-1819		85-04-29		VA-I-360	4803
RUSTER AUSLESE	7147	8164	WHITE WINE 1983	85-04-2779		85-04-11		KY-I-346	A-103
RUSTER SPATLESE	7147	8164	WHITE WINE 1982	85-04-2780		85-04-11		KY-I-346	A-102
EISWEIN	9622	8164	BEERENAUSLESE RULANDER	85-04-2904		85-04-11		IL-I-596	CH-85-009
SCHLOSS RAUER	9622	8164	EISWEIN BEERENAUSLESE	85-04-2906		85-04-11		IL-I-596	CH-85-001
SCHLOSS RAUER	9622	8164	AUSBRUCH GOLDBURGER	85-04-2905		85-04-11		IL-I-596	CH-85-002
NUSSBERGER	8680	8164	WHITE WINE	85-04-3493		85-04-16		NY-I-449	334
FALKENSTEINER	7457	8164	LIGHT WHITE WINE 1983	85-04-4760		85-04-22		NJ-I-403	TP-1
OSTERREICH FRAUENKIRCHNER	7770	8164	BEERENAUSLESE 1983	85-04-4654	T85-05-15	85-04-22		CIN-I-244	4873
FALKENSTEINER	1574	8164	GRUNER VELTLINER 1983	85-04-5226		85-04-24		OH-I-572	2264
SOUND OF MUSIC	8289	8164	'83 AUSTRIAN WHT TABLE WINE	85-04-5969		85-04-24		MA-I-226	S-418
THREE MONKS	6398	8164	FALKENSTEINER 1983	85-04-5790		85-04-26		MI-I-414	TM-001
WEINGUT FEILER RUSTER NEUB TR	1627	8164	AUSTRIAN WHT TABLE WINE	85-05-0201		85-05-01		CA-I-2580	739
WINZERGENOSSENSCHAFT GUMP. PIN	1627	8164	AUSTRIAN DRY WHT WINE	85-05-0200		85-05-01		CA-I-2580	740
RETZER RSLG.	9622	8164	AUSTRIAN WHT WINE	85-05-1719		85-05-08		IL-I-596	CH-85-311
WINZERGENOSSENSCHAFT GUMPOLDSK	1627	8164	GOLD ZIERFANDLER QUALIT.	85-05-2382		85-05-13		CA-I-2580	748
LIEBES-DREAM	7427	8164	RUSTER SPATLESE	85-05-4579		85-05-21		IL-I-678	098
LIEBES-DREAM	7427	8164	KREMSER SPATLESE TROCKEN,DRY	85-05-4580		85-05-21		IL-I-678	099
HANDELSGESELLSCH. FUR WAHR INGS	9406	8164	83 FRAUENKIRCHNER BEERENAUS.	85-05-4642		85-05-21		MA-I-254	1145
MORANDELL	0688	8164	STEINER HUND RHEINRIESLING	85-05-6459		85-05-28		WA-I-902	W 011
MORANDELL	0688	8164	KREMSER SANDGRUBE MULLER THURG	85-05-6458		85-05-28		WA-I-902	W 012
MORANDELL	0688	8164	PINOT BLANC WEISSBURGUNDER '83	85-05-6455		85-05-28		WA-I-902	W 015
MORANDELL	0688	8164	FALKENSTEINER GRUNER VELTLINER	85-05-6457		85-05-28		WA-I-902	W 013
MORANDELL	0688	8164	GUMPOLDSKIRCHNER ZIERFANDLER	85-05-6456		85-05-28		WA-I-902	W 014
SIEGENDORF	8756	8164	PINOT BLANC KABINETT	85-06-0205		85-06-01		CT-I-141	4023
SIEGENDORF	8756	8164	GEWURZTRAMINER KABINETT	85-06-0213		85-06-01		CT-I-141	4032
SIEGENDORF	8756	8164	TROCKENBEERENAUSLESE	85-06-0209		85-06-01		CT-I-141	4028
SIEGENDORF	8756	8164	EISWEIN	85-06-0207		85-06-01		CT-I-141	4026
SIEGENDORF	8756	8164	JOHANNISBERG RSLG SPATLESE	85-06-0211		85-06-01		CT-I-141	4030
SIEGENDORF	8756	8164	GRUNER VELTLINER KABINETT	85-06-0203		85-06-01		CT-I-141	4021
SIEGENDORF	8756	8164	GRUNER VELTLINER KABINETT	85-06-0206		85-06-01		CT-I-141	4025
SIEGENDORF	8756	8164	JOHANNISBERG RSLG KABINETT	85-06-0212		85-06-01		CT-I-141	4031
SIEGENDORF	8756	8164	GUMPOLDSKIRCHNER	85-06-0210		85-06-01		CT-I-141	4029
SIEGENDORF	8756	8164	BEERENAUSLESE	85-06-0208		85-06-01		CT-I-141	4027
SIEGENDORF	8756	8164	PINOT BLANC KABINETT	85-06-0204		85-06-01		CT-I-141	4022
EISWEIN BURGENLAND RIESLING BU	1932	8164	WHITE TABLE WINE	85-06-1327		85-06-06		9-I-254	85-66
GEWURZTRAMINER BURGENLAND /AU	1932	8164	WHITE TABLE WINE	85-06-1328		85-06-06		9-I-254	85-67
JOHANNISBERG RIESLING BURG AUS	1932	8164	WHITE TABLE WINE	85-06-1329		85-06-06		9-I-254	85-68
PINOT BLANC BURGENLAND-AUSLESE	1932	8164	WHITE TABLE WINE	85-06-1330		85-06-06		9-I-254	85-65
PINOT BLANC BURGENLAND-KABINETT	1932	8164	WHITE TABLE WINE	85-06-1331		85-06-06		9-I-254	85-70
PINOT NOIR BURGENLAND E-SPATLES	1932	8164	RED TABLE WINE	85-06-1326		85-06-06		9-I-254	85-69
PRIVATE RESERVE BURGENLAND-EIS	1932	8164	WHITE TABLE WINE	85-06-1332		85-06-06		9-I-254	85-71
SCHLOSS GRAFENEGG	6933	8164	STRASSER BEERENAUSLESE 1979	85-06-2641		85-06-10		CC-I-234	5/22-91
SCHLOSS GRAFENEGG	6933	8164	STRASSER AUSLESE MULLER THURGA	85-06-2640		85-06-10		O-I-234	5/22-92
SCHLOSS GRAFENEGG	6933	8164	MULLER THURGAU 1983	85-06-2639		85-06-10		C-I-234	5/22-93
SCHLOSS GRAFENEGG	6933	8164	GRUNER VELTLINER 1983	85-06-2638		85-06-10		CO-I-234	5/22-94
SCHLOSS GRAFENEGG	6933	8164	RHEINRIESLING 1983	85-06-2642		85-06-10		C-I-234	5/22-90
PINOT BLANC	8756	8164	BURGENLAND KABINETT	85-06-2368		85-06-10		CT-I-141	4041
DOMINO	0719	8164	GUMPOLDSKIRCHNER 1983	85-06-0881	T85-09-11	85-06-11		TX-I-249	1-2662
RUSTER GRUNER VELTLINER	1627	8164	EISWEIN	85-06-2770		85-06-11		CA-I-2580	743
RUSTER NEUBURGER	1627	8164	TROCKENBEERENAUSLESE	85-06-2769		85-06-11		CA-I-2580	742
ALTES WEINHAUS	2662	8164	FALKENSTEINER 1983	85-06-2887		85-06-11		BW-78-CH	223
SIEGENDORF	6285	8164	TROCKENBEERENAUSLESE	85-06-3031		85-06-12		[illegible]-I-320	C1-1
SIEGENDORF	6285	8164	GRUNER VELTLINER	85-06-3032		85-06-12		IN-I-323	C2-1
GOLDBERG WEINGUT	8756	8164	NEUBURGER	85-06-1689		85-06-17		WA-I-1006	382

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SIEGENDORF	1932	8164	JOHANNISBERG RIESLING KAB	85-06-4699		85-05-29		9-I-294	85-91
PINOT BLANC	7364	8164	BURGENLAND KABINETT	85-06-4583		85-06-21		MD-I-242	1923
SIEGENDORF	7364	8164	PINOT BLANC BURGENLAND KAB	85-06-4585		85-06-21		MD-I-242	1927
SIEGENDORF	7364	8164	RIESLING BURGENLAND KAB	85-06-4582		85-06-21		MD-I-242	1925
SIEGENDORF	7364	8164	PINOT BLANC BURGENLAND KAB	85-06-4586	T85-09-18	85-06-21		MD-I-242	1926
SIEGENDORF	7364	8164	TROCKENBEERENAUSLESE	85-06-4581	T85-09-18	85-06-21		MD-I-242	1924
PINOT BLANC	8256	8164	BURGENLAND KABINETT	85-06-4962		85-06-24		CT-I-141	4379
SIEGENDORF	8256	8164	BEERENAUSLESE BURGENLAND GEWURZ	85-06-4959		85-06-24		CT-I-141	4087
SIEGENDORF	8256	8164	JOHANNISBERG RSLG SPATLESE	85-06-4958		85-06-24		CT-I-141	4085
SIEGENDORF	8256	8164	PINOT BLANC BURGENLAND KAB	85-06-4956	T85-09-20	85-06-24		CT-I-141	4083
SIEGENDORF	8256	8164	PINOT BLANC BURGENLAND KABINET	85-06-4960	T85-09-20	85-06-24		CT-I-141	4088
SIEGENDORF	8256	8164	TBA BURGENLAND PINOT BLANC	85-06-4963	T85-09-20	85-06-24		CT-I-141	4078
SIEGENDORF	8256	8164	GRUNER VELTLINER BURGENLAND KA	85-06-4961		85-06-24		CT-I-141	4080
SIEGENDORF	8256	8164	GEWURZTRAMINER BURGENLAND KAB	85-06-4955		85-06-24		CT-I-141	4082
SIEGENDORF	8256	8164	EISWEIN BURGENLAND RSLG	85-06-4964	T85-09-20	85-06-24		CT-I-141	4077
SIEGENDORF	8256	8164	JOHANNISBERG RSLG KABINETT	85-06-4957		85-06-24		CT-I-141	4086
LENZ MOSER	1787	8164	GRUNER VELTLINER 1983	85-06-6807		85-06-27		GA-I-429	1990
LENZ MOSER	1787	8164	AUSLESE 1983	85-06-6811		85-06-27		GA-I-429	1995
VARIUM S	5628	8164	WINZERWEIN	85-06-6564	T85-12-25	85-06-28		13-I-294	122891
SIEGENDORF	7364	8164	GUMPOLDSKIRCHNER KABINETT	85-07-0210		85-07-01		MD-I-242	1928
SCHLOSS KAPFENSTEIN	6610	8164	PINOT NOIR STYRIA KABINETT	85-07-0029		85-07-02		TX-I-202	W 215
SCHLOSS KAPFENSTEIN	6610	8164	GRUNER VELTLINER STYRIA KAB	85-07-1026		85-07-02		TX-I-202	W 216
ROHRER	8600	8164	TROCKENBEERENAUSLESE 1981	85-07-0633		85-07-02		NY-I-449	348
SCHLOSSADLER	8123	8164	MONCHHOFER KAISERGARTEN EISWEI	85-07-0867	T85-08-32	85-07-08		CA-I-22	23
BURGENLAND PINOT BLANC	8600	8164	KABINETT	85-07-1033		85-07-09		NY-I-449	357
GEWURZTRAMINER	8603	8164	KABINETT	85-07-1037		85-07-09		NY-I-449	353
PINOT BLANC	8603	8164	KABINETT	85-07-1032		85-07-09		NY-I-449	354
SAUVIGNON BLANC	8600	8164	KABINETT	85-07-1036		85-07-09		NY-I-449	355
TROCKENBEERENAUSLESE	8603	8164	AUSTRIAN PINOT BLANC	85-07-1035		85-07-09		NY-I-449	356
MARGHEIM	5521	8164	VINHO VERDE BRANCO	85-07-1343		85-07-12		.I-203	731
AMADEUS	1557	8164	CHARDONNAY 1983	85-07-2859	T85-10-15	85-07-15		.I-53	AM-97-12-01
SIEGENDORF	9552	8164	JOHANNISBERG RSLG	85-07-1965		85-07-15		I-I-13	541
SIEGENDORF	9552	8164	PINOT BLANC KABINETT	85-07-1962		85-07-15		I-I-13	538
SIEGENDORF	9552	8164	RSLG KABINETT	85-07-1964		85-07-15		I-I-13	540
SIEGENDORF	9552	8164	PROPRIETOR'S RESERVE	85-07-1963		85-07-15		I-I-13	539
STRASSER	8765	8164	RSLG	85-07-2321		85-07-16		TX-I-530	SW0708221
SIEGENDORF	8600	8164	SCHLOSSWEIN GRUNER VELTLINER	85-08-2008		85-08-13		NY-I-449	360
SIEGENDORF	8603	8164	EISWEIN	85-08-2005		85-08-13		NY-I-449	357
SIEGENDORF	8600	8164	PINOT NOIR	85-08-2006		85-08-13		NY-I-449	359
SIEGENDORF	8603	8164	GUMPOLDSKIRCHNER KABINETT	85-08-2007		85-08-13		NY-I-449	361
SIEGENDORF	6750	8164	BEERENAUSLESE 1983 GEWURZTRAMI	85-08-5176		85-08-26		NM-I-121	309
SIEGENDORF	6793	8164	PRIVATE RESERVE RSLG 1981	85-08-5174		85-08-26		NM-I-121	311
SIEGENDORF	6741	8164	PINOT BLANC 1983	85-08-5177		85-08-26		NM-I-121	333
SIEGENDORF	6790	8164	PRIVATE RESERVE 1983	85-08-5175		85-08-26		NM-I-121	313
SIEGENDORF	6790	8164	PINOT BLANC 1983	85-08-5178		85-08-26		NM-I-121	332
DURNBERGER	8265	8164	DANUBE CASTLE DRY	85-08-5229		85-08-26		TX-I-533	SW850715228
GUMPOLDSKIRCHNER	8765	8164	NEUBURGER SPATLESE	85-08-5221		85-08-26		TX-I-530	SW850715229
GUMPOLDSKIRCHNER	5056	8164	KABINETT	85-10-5705		85-10-30		13-I-296	197
PINOT BLANC	5056	8164	WHITE WINE	85-10-5736		85-10-30		13-I-296	196
SONNENLAND WHITE	5336	8164	WHITE WINE	85-10-5734		85-10-30		13-I-296	198
SIEGENDORF	5754	8164	EISWEIN	85-10-5930		85-10-30		NY-I-447	PNYW-1433
SIEGENDORF	8603	8164	SCHLOSSWEIN	85-10-5987		85-10-31		NY-I-449	380
THE PLAZA	8600	8164	PINOT BLANC KABINETT	85-10-6330		85-10-31		NY-I-449	381
SIEGENDORF	6793	8164	GRUNER VELTLINER 1983	85-11-3351	T86-01-15	85-11-14		NM-I-121	324
SIEGENDORF	6750	8164	GEWURZTRAMINER KABINETT 1983	85-11-3352	T86-01-15	85-11-14		NM-I-121	308

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DATE PREPARED: 09 JUL 86                BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS                                          PAGE:   28
                                       CERTIFICATE OF LABEL APPROVAL (COLA) SYSTEM

                                   C/T                                     DOCUMENT    CANCEL OR DATE OF          PLANT OR     APPLICANT
BRAND NAME                    VEND CODE CLASS/TYPE (C/T) DESCRIPTION      SERIAL NBR  TEMP DATE APPROVAL FORM PERMIT NBR   SERIAL NBR

SIEGENDORF                    4793 8164 MULLER THURGAU KABINETT 1983     85-11-0353            85-11-04       NM-1-121     307
SIEGENDORF                    4793 8164 RIESLING KABINETT 1983           85-11-0354  T86-01-15 85-11-04       NM-1-121     306
SIEGENDORF                    4793 8164 JOHANNISBERG RSLG 1983           85-11-0353  T86-01-15 85-11-04       NM-1-121     301
SIEGENDORF                    4793 8164 RIESLING KABINETT 1983           85-11-0355  T86-01-15 85-11-04       NM-1-121     305
JOHANNISBERG RIESLING         5294 8164 BURGENLAND KABINETT              85-11-2800            85-11-15       MI-1-447     PMVW-1436
PINOT BLANC                   5294 8164 BURGENLAND AUSLESE               85-11-2801            85-11-15       MI-1-447     PMVW-1437
SIEGENDORF                    8680 8164 PINOT BLANC KABINETT             85-11-3210  T86-02-18 85-11-18       NY-1-449     378
SAO DOMINGOS                  7271 8164 VINHO BRANCO SECO                85-11-4783  T86-02-26 85-11-26       IL-1-717     2010
SAO DOMINGOS                  7271 8164 VINHO BRANCO 1983                85-11-4787  T86-02-26 85-11-26       IL-1-717     2008
SAO DOMINGOS                  7273 8164 RESERVA 1980                     85-11-4788  T86-02-26 85-11-26       IL-1-717     2007
SCHLOSSADLER                  8123 8164 WELSCHRIESLING SPATLESE          85-12-0295            85-12-03       CA-1-2282    24
GUMPOLDSKIRCHNER              7229 8164 PINOT CHARDONNAY 1983            86-02-2736            86-02-25       CA-1-2241    GU3
GUMPOLDSKIRCHNER              7229 8164 GRIMLING AUSLESE 1982            86-02-2747            86-02-25       CA-1-2241    GU1
GUMPOLDSKIRCHNER              7229 8164 SPATLESE 1982                    86-02-2740            86-02-25       CA-1-2241    GU2
SIEGENDORF                    4790 8164 PRIVATE RESERVE                  86-03-1894            86-03-17       [illegible]-1-121     310
SIEGENDORF                    4790 8164 GEWURZTRAMINER                   86-03-1892            86-03-17       NM-1-121     308
SIEGENDORF                    9552 8164 GEWURZTRAMINER                   86-03-2441            86-03-20       I-1-13       3158
SIEGENDORF                    9552 8164 PINOT BLANC                      86-03-2442            86-03-20       I-1-13       3159
SIEGENDORF                    9552 8164 PINOT BLANC                      86-03-2438            86-03-20       I-1-13       3155
SIEGENDORF                    9552 8164 RSLG KABINETT TRUCKEN            86-03-2439            86-03-20       I-1-13       3156
SIEGENDORF                    9552 8164 GRUNER VELTLINER                 86-03-2440            86-03-20       I-1-13       3157
RUSTER AUSLESE                7147 8164 NEUSIEDLERSEE BURGENLAND 1983    86-04-4293  T86-05-08 86-04-24       NY-1-365     M-109
RUSTER AUSLESE                5010 8164 NEUSIEDLERSEE BURGENLAND 1983    86-06-5247            86-06-30       SF-1-543     061786-2
END OF REPORT
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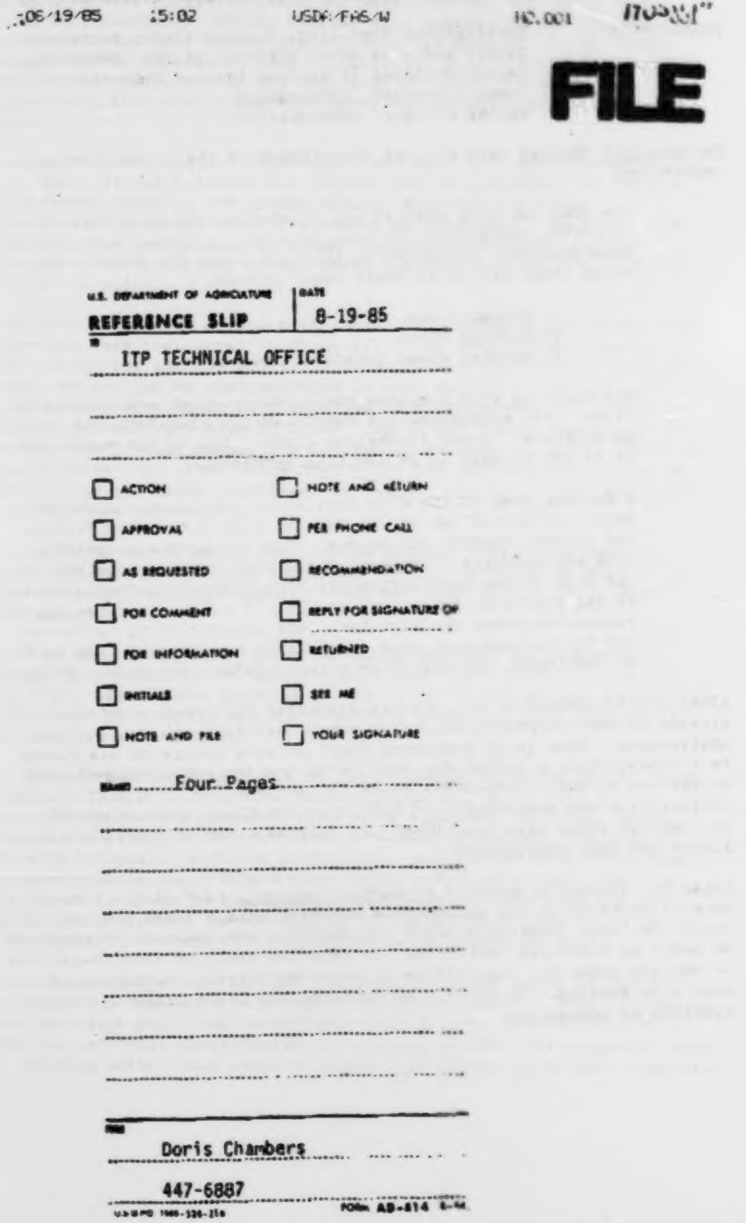
APPENDIX 2.—U.S. EMBASSY CABLES AND FOREIGN GOVERNMENT COMMUNICATIONS WITH U.S. GOVERNMENT CONCERNING CONTAMINATED WINES



06/19/85 15:02 USDA/FAS/W NO.001

FILE

U.S. DEPARTMENT OF AGRICULTURE
REFERENCE SLIP

DATE 8-19-85

TO ITP TECHNICAL OFFICE

☐ ACTION
☐ APPROVAL
☐ AS REQUESTED
☐ FOR COMMENT
☐ FOR INFORMATION
☐ INITIALS
☐ NOTE AND FILE
☐ NOTE AND RETURN
☐ PER PHONE CALL
☐ RECOMMENDATION
☐ REPLY FOR SIGNATURE OF
☐ RETURNED
☐ SEE ME
☐ YOUR SIGNATURE

REMARKS Four Pages

FROM
Doris Chambers
447-6887

FORM AD-814

TO: MEMORANDUM TO FILE July 30, 1985

FROM: James K. Freckmann, AgCounselor JF

SUBJECT: Austria: Meeting at the Ministry of Agriculture regarding the Wine Adulteration Affair. July 25, 1985 (10:30-12:15).

PARTICIPANTS:
1) Sektionschef Dipl.-Ing. Steiner (Under Secretary level) and some other officers of the Ministry.
2) Representatives of various invited Embassies
3) James Freckmann, AgCounselor
4) Walter Krucsay, AgSpecialist.

Sektionschef Steiner gave a brief discription of the Austrian wine regulation:

> The wine law is a special act related to the food law. It contains, among other things, relevant regulations regarding wine quality. According to this act there are 3 types of wines (they differ in their sugar content):
>
> 1) Normal wines
> 2) Quality wines
> 3) Special wines (predicate wines)
>
> The wine law also includes the products which are allowed in wines. All substances not mentioned are therefore not permissible. Since diethylene glycol (DG) is not mentioned, it is not allowed as an additive in wines.
>
> A further item of the wine regulation act is wine control which is carried out by the Federal Wine Inspection Service and certain Federal Institutes. The latter are concerned with the analysis of wines. These institutes are partly in the area of the Agriculture Ministry and partly in the area of the Health Ministry. At present, 7 such institutes are registered under the wine law. All exports going to the EC and Switzerland must have an analysis certificate from such an Institute, but all other exports under current law do not.

After the introduction, Mr. Steiner discussed the "wine scandal". Already in February/March suspicion arose that wine may be adulterated. Then in an anonymous supplied wine sample DG was found. As a consequence, a method for routine DG testing was developed, and by the end of March inspectors began to take samples from plants where adulteration was suspected. In mid-April the first quantities of adulterated wines were impounded. By July 24, 1985 about 3 million liters had been confiscated.

After Mr. Steiner's speech, Mr. Gerhard Sklenar, head of the wine control division of the Agriculture Ministry gave a short account about the steps undertaken after the Ministry was informed of positive DG tests by a Federal institute. He repeated that the wine inspectors -- who are under his supervision -- were immediately instructed to draw wine samples. At first they concentrated their activity on the Province of Burgenland.

Since the tests of two plants were positive, large wine volumes were impounded. (The common procedure in Austria is that the wine inspector draws samples from suspicious plants. If the tests carried out by a Federal Institute prove any adulteration, the whole wine volume is impounded.) Later, further wine quantities had to be confiscated. It soon became evident that the problem was of larger dimensions than expected. Thus on April 25, a provincial institute in Mainz (W. Germany), namely the Institute of the Ministry for Agriculture, Wine Production & Forestry was informed by telex of the matter.

At this point Mr. Steiner interrupted and said that one day before (i.e. April 24) he informed the officer who is competent for foreign agricultural trade in the German Federal Ministry for Food, Agriculture & Forestry about the matter by telephone. He added that they wanted to inform Austria's most important purchaser and the relevant Ministry quickly before these agencies got the information through the media.

G. Sklenar continued, saying that immediately after DG was found, the inspectors were instructed to check all wines destined for export, particularly the special wines. However, since the original analysis method was not yet as sophisticated as that currently applied, it is possible that some wines were exported containing some DG. Previous analysis methods were able to trace 0.2g DG per liter, then 0.1g and finally, the present method was introduced on July 12, 1985, which is able to trace 5mg. This means that after the introduction of the DG analysis for all wines certified for export, the DG content can only be below those quantities.

As soon as DG was found in the 15 wine control areas, the food inspection service was also informed. Events accelerated when it was found that not only high quality wines but also simple wines were adulterated.

In order to provide the highest amount of security to consumers abroad, no predicate wine may now leave Austria without the quality seal. All other wines which go to the EC or to Switzerland require a certificate of analysis and are therefore under the firm control of the Austrian authorities.

Mr. Steiner explained that due to the intensive controls so far about 5 million liters of wine have been confiscated. More than 40 dealer/producers are suspects and 5 were arrested. However, these figures are less than 2% of the total number of persons involved in the wine business. Austrian authorities have reason to believe that the adulteration began with a very small number of people. Most of the people involved in the scandal purchased the wine from the few adulterating plants. Nevertheless, all adulterated wine found has been impounded and all involved persons will appear in court.

Austria has always been obliged to check all wines going to the EC & Switzerland. Clearance is attested by a certificate. This obligation does not exist for other countries. However, Mr. Steiner offered to also give official certificates to these countries. He suggested that all foreign authorities require such a certificate from their importers to ensure maximum safety. However, Mr. Steiner regards this measure as an intermediate first step until legislative steps are undertaken by the Austrian Government in the next legislative session in the fall.

Mr. Steiner requested the assistance of the authorities of those countries which have imported Austrian wines. He mentioned that he receives a lot of information from the Austrian Embassies regarding impounded Austrian wines in various countries. It would be extremely helpful if the foreign authorities would contact directly the Agricultural Chemical Federal Institute (Address: Trunnerstr. 1-3, A-1010 Vienna) by supplying them with complete label information and the bill of lading number and shipment dates of wine found to be adulterated. In addition, the names & addresses of foreign wine testing institutes should be given to the Austrian authorities in order to establish direct contact. In the current situation, direct contact between the Austrian and the foreign institutes are necessary to speed up investigations. In addition, contacts through the official channels (Embassies) are being maintained. Mr. Steiner also suggested that foreign wine testing institutes should exchange their experience in DG analysis to improve testing methods further.

A list of plants involved in wine adulteration was forwarded by the Austrian Embassies to the various governments. Additional names will be supplied as soon as available. Today a list was sent to the Embassies with the names of adulterated wines, the plant names and the DG content.

After Mr. Steiner had finished, some questions were asked. The answers are as follows:

1. In the EC sorbic acid is permissible up to 200mg per liter. Usually 150mg per liter are added to wines. Current analysis can trace 1mg per liter.

2. If wine of 1980 was found adulterated, it does not mean that adulteration was going on that long, since the wine could have been adulterated at any time up to the time of bottling.

3. So far, DG has been found in 4 foreign produced wines according to Steiner:

   2 W. German
   1 S. Tyrolian (Italian)
   1 Hungarian

4. Since July 12, 1985, all Austrian institutes could analyze down to 5ppm DG.

5. The average quantity of DG found in adulterated wines was 2-3g. However, occasionally 16 to 40g were found.

6. Sautner wines have a particularly high content, and a few hours ago the population was warned not to drink Sautner wines.

7. The maximum "DG no effect level" is 35 mg/day/person.

8. Non-tested wine may still leave the country. Due to Austrian law, the government cannot stop exports. However, authorities of importing countries should demand an official certificate. Only certificates issued after July 12, 1985 guarantee that no DG (i.e. less than 5 ppm) may be in the wine.

9. In order to increase safety, Austrian customs officers are reporting to wine inspectors all wine volumes being exported without a certificate. Inspectors will immediately come to draw samples from such shipments.

10. The wine law will probably be changed in the autumn session of Parliament.

11. Wine checks are made at 3 levels:

    1. At the producer
    2. From storage before it goes to the retail trade
    3. At the retail level

12. The 16 wine inspectors are now being assisted by about 300 food inspectors of the Health Ministry. However, they are mainly involved in food inspections.

cc: DCM
POL
ECON
PCS
Medical Unit, Dr. Scheer
Technical Office, ITP, USDA/FAS/W
AO Hicks, USDA/FAS/W

Drafter: WKrucsay

OFFICE OF AGRICULTURAL AFFAIRS

AIRCOMM

FOREIGN AGRICULTURAL SERVICE

UNCLASSIFIED

Austrian Wine

TO : ITP Division, Attention Technical Officer FAS/USDA/W

DATE: 9/26/85

NO. 89

FROM : AmEmbassy VIENNA

SUBJECT : Listing of Adulterated Austrian Wines

REF :

DISTRIBUTION ACTION

Attached is a copy of the most recent update by the Austrian Ministry of Health of those wines containing diethylene glycol (DG). We have typed in on the first page the English translation of the abbreviations used. Please pass a copy to the appropriate person at Food and Drug.

INFO.

James K. Freckmann
Counselor for Agricultural Affairs

Enclosure: (2)

CC AGCOUNSELOR, AMEMBASSY BONN

UNCLASSIFIED

DRAFTED BY: AGR:JKF:tps

CLEARANCES:

FAS-276 (11-82)

List of Adulterated Wines found in Austria as of September 3, 1985
(compiled by the Ministry of Health)

LISTE DER IM INLAND BEANSTANDETEN WEINE
MIT STAND VOM 3. SEPTEMBER 1985
(erstellt nach Unterlagen des
Bundesministeriums für Gesundheit und Umweltschutz)

Abbreviations:

Abkürzungen:

pos.	keine Angabe über den Gehalt an DEG Figures regarding DEG content not available.
SL	Spätlese Made of late harvested grapes.
BL	Beerenauslese Made of grapes with a special fungus.
TB	Trockenbeerenauslese Made of selected dried grapes.
AL	Auslese Made of selected grapes.
AB	Ausbruch Made by a special extraction procedure.
EW	Eiswein Water content of grapes reduced by freezing.
KA	Kabinett A wine with a certain natural sugar content.
JG.	Jahrgang Year
Qu.	Quelle Type
BH	Behälter Container
z	Zisterne Cistern.
b	Blockpackung Paper carton.
t	Tank Tank
f	Flasche Bottle
fa	Faß Barrel
df	Doppelflasche 2-liter bottle
DEGL	Gehalt an Diethylenglycol in g/l Content of diethylene glycol in grams per liter.

VERFÜGUNGSBERECHTIGTER	MARKE	JG	QU	BH	DEGL
ADEG ST.PØLTEN	VALPOLICELLA, VINO DI GUALITA	-	-	f	0.1
AIGNER ROBERT	SIEHE SCHWANBERGKELLEREI	-	-	-	-
ALTE HOFKELLEREI	SIEHE MORANDELL U. SOHN	-	-	-	-
BAUER - WEIN	öSTERR. ROSE RETZER SONDERF.	-	-	f	0.37
BERGHOF KELLEREI	GRØNER VELTLINER, öST. WEIN	-	-	f	0.98
BERGHOF KELLEREI	LANDWEIN ROT	-	-	b	0.2
BERGHOF KELLEREI	LANDWEIN ROT	-	-	b	0.05
BERGHOF KELLEREI	LANDWEIN ROT 18/12.6.85	-	-	b	0.1
BERGHOF KELLEREI	LANDWEIN WEIß	-	-	b	0.08
BERGHOF KELLEREI	LANDWEIN WEIß	-	-	b	0.212
BERGHOF KELLEREI	LANDWEIN WEIß	-	-	b	0.06
BERGHOF KELLEREI	LANDWEIN WEIß	-	-	b	0.3
BERGHOF KELLEREI	LANDWEIN WEIß	-	-	b	0.004
BERGHOF KELLEREI	LANDWEIN WEIß	-	-	b	0.2
BERGHOF KELLEREI	LANDWEIN ROT	-	-	b	0.04
BERGHOF KELLEREI	LANDWEIN ROT	-	-	b	0.30
BERGHOF KELLEREI	LANDWEIN ROT	-	-	b	0.041
BERGHOF KELLEREI	LANDWEIN ROT	-	-	b	0.15
BERGHOF KELLEREI	LANDWEIN ROT	-	-	b	0.12
BERGHOF KELLEREI	SEEBARON ROT	-	-	f	0.07
BERGHOF KELLEREI	SEEBARON ROT 2L	-	-	f	0.08
BERGHOF KELLEREI	SEEBARON WEIß	-	-	f	0.27
BERGHOF KELLEREI	SEEBARON WEIß	-	-	f	0.4
BERGHOF KELLEREI	SEEBARON WEIß	-	-	f	0.39
BERGHOF KELLEREI	öSTERR. ROTWEIN 13.5.85	-	-	b	0.18
BERGHOF KELLEREI	ÖSTERR. ROTWEIN 15.5.85		-	b	0.12
BERGHOF KELLEREI	öSTERR. ROTWEIN 15.5.85	-	-	f	0.13
BERGHOF KELLEREI	öSTERR. ROTWEIN, HAUSMARKE	-	-	f	0.04
BERGHOF KELLEREI	öSTERR. WEIßWEIN	-	-	b	0.21
BERGHOF KELLEREI	öSTERR. WEIßWEIN	-	-	b	0.23
BERGHOF KELLEREI	öSTERR. WEIßWEIN 31.5.85	-	-	b	0.17
BERGHOF KELLEREI	öSTERR. WEIßWEIN	-	-	b	0.16

VERFÜGUNGSBERECHTIGTER	MARKE	JG	QU	BH	DEGL
BGLD. WEINHANDELSGES.	RUSTER SPäTLESE 1983	83	SL	-	0.3
BGLD. WEINHANDELSGES.	RUSTER SPäTLESE 1984	84	SL	-	0.2
BGLD. WEINHANDELSGES.	SPäTLESE 1983	83	SL	-	0.2
BIERBAUM GEORG	HERRENRITT öST.WEIßWEIN	-	-	f	0.05
BIERBAUM GEORG	KIRCHENBERGER öST.ROTWEIN	-	-	f	0.2
BIERBAUM GEORG	WEISSWEIN	-	-	t	0.8
	BEAUJOLAIS, BAUMES DE VENISE österr. Abfüller unbekannt	-	-	f	3.12
BURSCHIK S R. NACHFOLGER	MUSKATELLER DESSERTW.			f	0.13
BURSCHIKS R. NACHFOLGER	WERMUT HELL	-	-	t	0.14
BURSCHIKS R. NACHFOLGER	REFOSKO	-	-	fa	0.14
CARLO R. WEINGUT	ORIG.ILLMITZER THURGAU	-	-	f	0.20
CEMBRAN JOSEF	BARONE ROSSO	-	-	f	1.2
CEPEK KARL	KLOSTERHERREN ROTWEIN 530 2L	-	-	f	0.22
CEPEK KARL	KLOSTERHERREN WEIßWEIN 2L	-	-	f	0.21
CEPEK KARL	STEINBICHL ROTWEIN 527 2L	-	-	f	0.3
CEPEK KARL	STEINBICHL WEIßWEIN 529 2L	-	-	f	0.18
CEPEK KARL	WINZER KRAXN GR. VELTLINER	-	-	f	0.19
CLOTAR BOUVIER	BOUVIER BLANCHE (SEKT,HALBS.)	-	-	f	0.27
DELIKATESSA GMBH	HAUSMARKE FRUCHTIGER WEIßW.	-	-	f	2.0
DELIKATESSA GMBH	HAUSMARKE MILDER ROTWEIN	-	-	f	0.032
DELIKATESSA GMBH	HAUSMARKE MILDER ROTWEIN	-	-	f	0.11
DELIKATESSA GMBH	HAUSMARKE WEIßWEIN	-	-	f	1.0
DELIKATESSA GMBH	HEURIGER 1984, ROTWEIN	-	-	f	0.2
DELIKATESSA GMBH	HEURIGER 1984, WEIßWEIN	-	-	f	0.1
DELIKATESSA GMBH	KELLERTRöPFERL WEIßWEIN	-	-	f	0.1
DELIKATESSA GMBH	KELLERTRöPFERL WEIßWEIN	-	-	f	0.7
DELIKATESSA GMBH	KELLERTRöPFERL öST.ROTWEIN	-	-	f	1.0
DELIKATESSA GMBH	ROTER MUSKETIER	-	-	b	0.33
DELIKATESSA GMBH	WEIßER MUSKETIER	-	-	b	1.5

VERFÜGUNGSBERECHTIGTER	MARKE	JG	QU	BH	DEGL
DELIKATESSA GMBH	WEIßER MUSKETIER	-	-	b	0.4
DIEM WEINGUT BUSCHENSCHENKE	NUßBERGER BL. BURGUNDER ZWEIG.	-	-	f	0.05
DONNER HERBERT	KREMSER GRüNER VELTL.			f	.217
DONNER HERBERT	KREMSER GRüNER VELTLINER	-	-	f	0.4
DONNER HERBERT	KREMSER GRüNER VELTLINER	84	-	f	0.3
DONNER HERBERT	KREMSER GRüNER VELTLINER	-	-	f	0.7
DONNER HERBERT	öSTERR. ROTWEIN	-	-	f	0.35
DONNER HERBERT	POYSDORFER RIESLING	-	-	f	0.46
DONNER HERBERT	WEISSWEIN Nö	-	-	z	0.6
DONNER HERBERT	ZISTERSDORFER WEISSWEIN	84	-	z	0.4
EDLINGER KONRAD	MöNCHHOFER SPäTLESE	-	SL	f	1.0
EDLINGER KONRAD	MöNCHHOFER SPäTLESE	-	SL	f	1.2
FRIEDRICH G.	BUSCHENSCHENKER	-	-	f	1.0
FüRST A.GMBH	ROTWEIN	83	-	t	0.3
FüRST A.GMBH	WEISSWEIN	84	-	t	0.3
GLASER ERNST	GRüNER VELTLINER	84	-	f	1.0
GOLDENITS RICHARD	ORIG. TADTNER BLAUFRäNKISCH	-	SL	f	0.52
GOLDENITS RICHARD	ORIG. TADTNER MUSKAT SYLVANER	-	AL	f	0.57
GOLDENITS RICHARD	ORIG. TADTNER WELSCHRIESLING	-	SL	f	0.39
GOLDENITS RICHARD	ORIG. TADTNER ZWEIGELT ROSE	-	-	f	0.08
GRILL BRüDER	ALTER SüNDER	81	-	f	0.22
GRILL BRüDER	ALTER SüNDER 38/84	-	-	f	0.04
GRILL BRüDER	ALTER SüNDER 40/98	-	-	f	0.15
GRILL BRüDER	ALTER SüNDER 50/83	-	-	f	1.4
GRILL BRüDER	BARBARELLA ERDBEERSCHAUMWEIN	-	-	f	1.9
GRILL BRüDER	BARBARELLA MARILLENSCHAUMWEIN	-	-	f	0.06
GRILL BRüDER	BARONESSE WEIßBURGUNDER	76	-	f	2.1
GRILL BRüDER	BARONESSE öST.QUAL.BURGUNDER	82	-	f	3.1
GRILL BRüDER	BILDSTöCKL öST. ROTWEIN	-	-	f	0.40
GRILL BRüDER	BILDSTöCKL öST. ROTWEIN	81	-	f	0.06

SUBCOMMITTEE NOTE:

The remaining 20 pages of this document, listing hundreds upon hundreds of contaminated Austrian wines, together with DEG levels, have been omitted, but are available in the subcommittee's office for review.

Department of State TELEGRAM

PAGE 01 BONN 20180 111556Z [illegible]
ACTION HHS-05

INFO LOG-00 COPY-01 ADS-00 AID-00 AGR-10 EUR-00 CIAE-00
DODE-00 IO-16 NSAE-00 [illegible] HA-08 PA-02 OCS-06
FDRE-01 CA-02 OES-01 OES-09 USIE-00 SP-00 PRS-01
/076 W
------------------051643 120702Z /11

R 111055Z JUL 85
FM AMEMBASSY BONN
TO SECSTATE WASHDC 6483
INFO AMEMBASSY VIENNA
FRG COLLECTIVE

UNCLAS BONN 20180

DEPARTMENT PASS HHS, FDA

E.O. 12356: N/A
TAGS: SOCI, GE
SUBJECT: ADULTERATED AUSTRIAN WINES THREATEN SUMMER SCANDAL IN GERMANY, OR, WAS IT A HANGOVER OR THAT ANTIFREEZE?

1. THE DISCLOSURE THAT A SUBSTANTIAL VOLUME OF WINE IMPORTED FROM AUSTRIA CONTAINS A POISON NORMALLY USED AS ANTIFREEZE HAS HIT THE HEADLINES IN THE FRG. WHAT HAS CAUSED THE MOST STIR IS THAT HEALTH AUTHORITIES HAVE KNOWN ABOUT THE SITUATION FOR SEVERAL MONTHS, BUT DID NOT ACT TO TAKE THE WINE OFF STORE SHELVES. THE MEDIA COVERAGE IS LIKELY MORE EXTENSIVE THAN IT OTHERWISE MIGHT BE BECAUSE THE STORY HAS BROKEN IN THE MIDST OF BONN'S NORMALLY QUIET SUMMER SEASON.

2. THE WINE IN QUESTION WAS LACED WITH DIETHYLENE GLYCOL, WHICH IS FATAL IN LARGE QUANTITIES. THE SUBSTANCE WAS ADDED TO GIVE THE WINE A SWEETER TASTE AND DARKER COLOR, SO THAT IT COULD BE MARKETED AS ONE OF THE HIGHER GRADES OF WINE (SPAETLESE, AUSLESE OR BEERENAUSLESE - GRADES WHICH ARE NORMALLY OBTAINED BY LEAVING THE GRAPES ON THE VINE FOR LONGER THAN AVERAGE PERIODS AND USING ONLY SPECIALLY SELECTED GRAPES). THE ADULTERATED WINE CONTAINS VARYING AMOUNTS OF DIETHYLENE GLYCOL, BUT LESS THAN A FATAL DOSE, WHICH IS AROUND 110 TO 170 GRAMS. AT THE REDUCED DOSE, HOWEVER, NAUSEA, VOMITING AND DIARRHEA CAN OCCUR, AS WELL AS A LOSS OF BALANCE AND IMPAIRED SPEECH. IN SMALL QUANTITIES ESPECIALLY, THE PRESENCE OF THE COMPOUND IS VERY DIFFICULT FOR THE LAYMAN TO DETECT, EXCEPT PERHAPS AS AN UNEXPECTED HANGOVER. ABOUT ONE PERCENT OF AUSTRIAN WINE EXPORTS TO THE FRG IS BELIEVED TO BE AFFECTED.

3. CRITICISM HAS CENTERED AROUND HEALTH AUTHORITIES, BOTH FEDERAL AND STATE (RHINELAND-PALATINATE), WHO APPARENTLY KNEW OF THE PROBLEM TWO TO THREE MONTHS AGO, BUT DID NOT GO PUBLIC. THE AUSTRIAN AGRICULTURAL MINISTRY MADE A PUBLIC ANNOUNCEMENT ON APRIL 23 REGARDING THE IMPURE WINE, AND ACCORDING TO MINISTRY AUTHORITIES, NOTIFIED GERMAN OFFICIALS TWO DAYS LATER OF THE PROBLEM. THE GERMAN FEDERAL MINISTRY OF YOUTH, FAMILY AND HEALTH ASKED STATE HEALTH AUTHORITIES IN MID-MAY TO EXAMINE THE WINE, BUT SINCE THE QUANTITIES OF DIETHYLENE GLYCOL WERE DEEMED TO BE LOW AND RELATIVELY HARMLESS, THE NEWS WAS KEPT OUT OF THE PRESS.

4. HEALTH AUTHORITIES, BOTH FEDERAL AND STATE, ARE NOW TAKING PAINS TO APPEAR RESPONSIVE TO PUBLIC CONCERNS, WHILE POINTING OUT THAT THE LEVELS OF DIETHYLENE GLYCOL ARE IN NO WAY LIFE-THREATENING. THE RHINELAND-PALATINATE HEALTH AUTHORITIES HAVE BEEN SINGLED OUT IN SOME QUARTERS AS NOT BEING UP TO THE JOB OF ENSURING THAT WINE REACHING THE MARKET IS SAFE TO CONSUME. A POLICY-LEVEL OFFICIAL AT THE FEDERAL YOUTH, FAMILY AND HEALTH MINISTRY NOTED THAT INTENSIVE CONSULTATIONS BETWEEN THE FEDERAL AND STATE AUTHORITIES WERE CONTINUING, AND A MEETING WOULD BE HELD EARLY NEXT WEEK TO ASSESS THE SITUATION AND TAKE STEPS TO ENSURE THAT IT IS NOT REPEATED. WOESSNER

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PAGE 01 VIENNA 10330 101500Z 7930
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AMCONSUL DUSSELDORF
AMCONSUL FRANKFURT
USMISSION GENEVA
AMCONSUL HAMBURG
AMCONSUL MUNICH
AMEMBASSY ROME
AMCONSUL STUTTGART
AMEMBASSY THE HAGUE

UNCLAS VIENNA 10330

BRUSSELS FOR USEC

E.O. 12356: N/A
TAGS: ECON, SOCI, GE, AU
SUBJECT: WINE SCANDAL SOURING AUSTRIAN-FRG RELATIONS

REF: BONN 20160 NOTAL

1. SUMMARY: THE ANTIFREEZE-IN-THE-WINE SCANDAL HAS AUSTRIAN VINTNERS EXTREMELY WORRIED ABOUT LOSING THEIR [illegible] [illegible] [illegible], [illegible] [illegible] [illegible] [illegible] [illegible] BONN'S UNNECESSARILY HARSH OVER-REACTION TO THE PROBLEM. END SUMMARY.

2. SINCE THE NEWS BROKE THAT SOME AUSTRIAN WINE EXPORTED TO THE FRG HAD BEEN ADULTERATED WITH POISONOUS ANTIFREEZE [illegible], THE GOA AND COMMERCIAL INTERESTS HAVE BEEN SCRAMBLING TO MINIMIZE THE DAMAGE TO AUSTRIAN VINTNERS. CHANCELLOR SINOWATZ HAS PROMISED TO INVESTIGATE THE POSSIBILITY OF NEW GOVERNMENT CONTROLS TO ENSURE THAT SIMILAR INCIDENTS DO NOT OCCUR IN THE FUTURE. LEGISLATION IS BEING DRAFTED WHICH WOULD STRENGTHEN INSPECTIONS OF WINE QUALITY. (APPARENTLY, GOVERNMENT INSPECTORS DISCOVERED THIS WRONGDOING BY ACCIDENT, WHEN THEY NOTICED AN EXTRAORDINARY AMOUNT OF ANTIFREEZE ON THE BOOKS OF ONE VINTNER AND DID NOT BUY HIS EXCUSE THAT AN EXTREMELY SEVERE WINTER HAD FORCED HIM TO USE MORE ANTIFREEZE IN HIS TRUCKS.)

3. AUSTRIAN VINTNERS ARE PLANNING A MEDIA CAMPAIGN IN THE FRG TO STRESS THAT ONLY A VERY SELECT GROUP OF WINES HAS BEEN FOUND TO BE TAINTED AND THAT THE VAST MAJORITY OF AUSTRIAN WINE IS PERFECTLY FIT TO DRINK. VINTNERS FROM RUST, THE AREA IN WHICH THREE OF FOUR TAINTED WINES WERE BOTTLED, ARE PLANNING TO MAKE A SPECIAL EFFORT AT FOOD AND WINE FAIRS IN THE FRG TO MAKE THE CASE THAT THERE IS NOTHING WRONG WITH MOST OF THEIR PRODUCTS. THEY ARE CLAIMING THAT THE OFFENDING WINE WAS BOTTLED ILLEGALLY UNDER RUST LABELS WITHOUT THEIR KNOWLEDGE.

4. THERE IS WIDE RESENTMENT HERE REGARDING THE WAY THE MATTER WAS HANDLED IN THE FRG. GOA OFFICIALS ARE STRESSING THAT THEY NOTIFIED RESPONSIBLE FRG OFFICIALS OF THE THREAT SEVERAL MONTHS AGO, IMPLYING THAT IT IS BONN'S FAULT THAT EARLY ACTION WHICH COULD HAVE PREVENTED PUBLIC PANIC WAS NOT TAKEN THEN. THERE IS ALSO A STRONG FEELING THAT WHEN THE WEST GERMAN AUTHORITIES DID MOVE, THEY DID SO IN A WAY WHICH OVERESTIMATED THE SCOPE OF THE PROBLEM AND AGGRAVATED THE SITUATION NEEDLESSLY. THE AUSTRIANS MAINTAIN THAT THERE IS NO EVIDENCE THAT ANYTHING MORE THAN A VERY SMALL PERCENTAGE OF THE WINES EXPORTED TO WEST GERMANY WERE AFFECTED. THE AUSTRIANS FURTHER CLAIM THAT THE FEW TAINTED SHIPMENTS ARE EASILY IDENTIFIABLE AND IT WAS GROSSLY UNFAIR FOR BONN TO HAVE ISSUED WARNINGS AGAINST CONSUMPTION OF ALL AUSTRIAN WINE. CHANCELLOR SINOWATZ IS REPORTED TO HAVE EXPRESSED THESE CONCERNS IN A PHONE CALL TO HIS FRG COUNTERPART KOHL ON JULY 12.

5. THE DISCONTENT AMONG AUSTRIAN VINTNERS IS MUCH MORE THAN A MATTER OF NATIONAL PRIDE. IT ALSO HAS POTENTIAL FOR HITTING THEM SEVERELY IN THE POCKET BOOK. ABOUT TWO THIRDS OF ALL AUSTRIAN WINE EXPORTS ARE DIRECTED TOWARDS THE FRG; THE TOTAL VALUE OF WINE SHIPMENTS TO WEST GERMANY WAS AS 32 MILLION IN 1984 (ABOUT DOLS 15 MILLION).

6. COMMENT: EVEN IF THE AUSTRIANS DO ESTABLISH THAT THE MAJORITY OF THEIR WINE MEETS ACCEPTED HEALTH STANDARDS, LINGERING LONG-TERM DAMAGE TO AUSTRIAN VITICULTURE IS PROBABLY INESCAPABLE, AS AUSTRIAN EXPORTERS FACE THE UNENVIABLE TASK OF MARKETING A LIBATION WHICH SUPPOSEDLY HAS ITS TASTE IMPROVED WHEN CUT WITH ANTIFREEZE. VON DAMM [illegible]

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ACTION AGR-01

INFO LOG-00 COPY-01 ADS-00 AID-00 INR-10 EUR-00 CIAE-00
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R 191751Z JUL 85
FM AMEMBASSY BONN
TO SECSTATE WASHDC 5703
INFO AMEMBASSY VIENNA
AMCONSUL HAMBURG

UNCLAS BONN 21896

PASS AGRICULTURE ELECTRONICALLY FOR, FAS AND ITP TECHNICAL OFFICE; VIENNA FOR AGCOUNS; HAMBURG FOR ATO.

E.O. 12356: N/A
TAGS: EAGR, GE
SUBJECT: ADULTERATED WINE FROM AUSTRIA

REF: BONN 20180

1. SUBSEQUENT TO SUBMISSION OF REFTEL, OFFICIALS REPORTED THAT DIETHYLENE GLYCOL (DG) HAD BEEN FOUND IN WINES UNDER GERMAN LABEL, BOTH IN THE NETHERLANDS AND IN BERLIN. HOWEVER, IN DISCUSSIONS WITH THE AGCOUNSELOR ON JULY 18, FRG MINHEALTH FOOD AND DRUG OFFICIALS ASSERTED THAT THE EARLIER REPORTS WERE FALSE. THEY STATED THAT DUTCH OFFICIALS AS WELL AS A BERLIN-WEST PUBLIC LABORATORY HAD REFUTED THEIR EARLIER REPORTS ABOUT DG FOUND IN GERMAN WINES. RE-TESTING REVEALED ERRORS IN EVALUATION OF RESULTS. THE PRESS HAD RELATED THESE CASES TO ADULTERATED AUSTRIAN IMPORTS, BUT THE MINISTRY EMPHASIZED THAT EC REGULATION 337/79 PROHIBITS BLENDING OF ANY EC WINE WITH THIRD-COUNTRY WINE.

2. IN A CONFERENCE ON JULY 16 OF MINHEALTH OFFICIALS AND REPRESENTATIVES OF THE STATE GOVERNMENTS, WHICH ARE RESPONSIBLE FOR IMPLEMENTATION OF FOOD AND DRUG PROVISIONS, IT WAS REAFFIRMED THAT A LARGE VOLUME OF ADULTERATED AUSTRIAN WINES WAS MARKETED IN THE FRG. CONTAMINATION REPORTED BY THE LABORATORIES RANGED FROM "SMALL AMOUNTS UP TO 1,000 PPM, IN ONE CASE 14,000 PPM". THE FEDERAL HEALTH AGENCY IN BERLIN REGARDS 100 PPM AS HARMFUL. IF A WINE CONTAINING DG WERE TO BE CONSUMED OVER A LONGER PERIOD, 30 PPM WOULD BE HARMFUL. IN FACT THE SUBSTANCE IS NOT PERMITTED FOR USE IN WINE PRODUCTION, ACCORDING TO EC REG 337/79. AFTER THE CONFERENCE PARTIALLY ATTENDED BY AUSTRIAN GOVERNMENT OFFICIALS, THE MINHEALTH SUBMITTED TO THE PRESS A LIST OF ABOUT 200 AUSTRIAN WINES BY BRAND, CATEGORY AND NAME OF SUPPLIER IN WHICH FRG STATE LABORATORIES HAD DETECTED DG. THEY POINTED OUT THAT FRG LABORATORIES ARE WORKING "DAY AND NIGHT" TO CLARIFY THE SITUATION.

3. THE ADMINISTRATIVE HANDLING OF THE AFFAIR HAS BEEN TERMED THE "SECOND SCANDAL" BY GERMAN NEWSPAPERS. THIS APPLIED TO THE PREMATURE PUBLICATION OF ANALYSIS RESULTS LATER DENIED AND THE SLOW COMMUNICATION BETWEEN FRG GOVERNMENT AGENCIES WHICH DELAYED WARNING OF CONSUMERS SEVERAL MONTHS. A NUMBER OF STATEMENTS TO THE PRESS BY UNDER SECRETARY OF HEALTH CHORY FOLLOWING THE JULY 16 CONFERENCE DEALT WITH ASSURING THE PUBLIC THAT IN THE FUTURE ALL RESPONSIBLE AUTHORITIES WILL IMMEDIATELY REACT TO THE VAGUEST SUSPICION. THE MEDIA ALSO EXPRESSED IRRITATION ABOUT THE AUSTRIAN GOVERNMENT NOT WARNING THEIR POPULATION. ON THIS POINT, THE BONN MINHEALTH COMMENTED THAT THE AUSTRIANS ARE OBVIOUSLY REGARDING THE AFFAIR AS ONLY RELATED TO THE EXPORT MARKET. PERHAPS, THIS ATTITUDE MIGHT BE JUSTIFIED PROVIDED THE AUSTRIANS DRINK PRIMARILY DRY WINES AND EXPORT MOST OF THE SWEET PRODUCT, A MINHEALTH OFFICIAL REMARKED.

4. WE WILL FOLLOW UP. BURNS.

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FM AMEMBASSY VIENNA
TO SECSTATE WASHDC 9208
INFO AMEMBASSY BONN
AMCONSUL HAMBURG

UNCLAS VIENNA 10082

TREASURY WASHDC FOR ALCOHOL TOBACCO AND FIREARMS
FOOD AND DRUG ADMIN WASHDC
PASS ELECTRONICALLY USDA/FAS

E.O. 12356: N/A
TAGS: EAGR, AU
SUBJECT: ADULTERATED FROM AUSTRIA

REF: VIENNA 10605, BONN 21665

1. NOTHING REALLY NEW CAME OUT OF TWO HOUR SESSION HELD BY MINISTRY OF AGRICULTURE FOR VARIOUS INVITED EMBASSY REPS JULY 25 EXCEPT THE DG PROBLEM WAS BROUGHT TO ATTENTION OF THE AUSTRIAN OFFICIALS AS EARLY AS LATE FEBRUARY, AND DI DIETHYLENE GLYCOL LACED WINES HAVE NOW BEEN FOUND IN ONE HUNGARIAN, ONE ITALIAN AND TWO W. GERMAN PRODUCED WINES, WITH MORE FINDINGS EXPECTED.

2. THE AUSTRIAN GOVERNMENT SINCE JULY 12, CAN TEST RELIABLY DOWN TO A LEVEL OF 5PPM OF DG.

3. THE MINISTRY REQUESTED THAT IN THE FUTURE GOVERNMENTS DIRECT ALL QUESTIONS DEALING WITH THE DG PROBLEM TO EITHER OF THE FOLLOWING PERSONS FOR A SPEEDY REPLY:

- FOR QUESTIONS CONCERNING ALL ASPECTS EXCEPT
- ACTUAL TESTING:
  - DOKTOR PETER LEJEUNE
  - OBERRAT, BUNDESKELLEREIINSPEKTION
  - BUNDESMINISTERIUM FUER LAND- UND
  - FORSTWIRTSCHAFT
  - STUBENRING 1
  - A-1010 WIEN (VIENNA) AUSTRIA
  - TELEX: 111780
  - TELEPHONE: 7500 - EX 6709
- FOR MATTERS DEALING WITH TESTING:
  - DOKTOR BECK
  - LANDWIRTSCHAFT CHEMISCHE BUNDESANSTALT
  - TRUNNERSTRASSE 1-3
  - A-1020 WIEN (VIENNA) AUSTRIA
  - TELEPHONE: 24 15 11

4. IN ADDITION, A MINISTRY SPOKESMAN REQUESTED THAT THE AG COUNSELOR CONVEY TO THE COMPETENT U.S. AUTHORITIES A REQUEST THAT THE UNITED STATES REQUIRE THAT ALL FUTURE IMPORTS BE ACCOMPANIED BY A FEDERAL AUSTRIAN CERTIFICATE ATTESTING THAT THE WINE WAS TESTED AT THE 5PPM LEVEL FOR DG AND NONE WAS FOUND. APPARENTLY UNTIL THE AUSTRIAN PARLIAMENT CAN CHANGE THE WINE LAWS SOMETIME NEXT FALL, UNTESTED WINE CAN STILL BE EXPORTED LEGALLY FROM THIS COUNTRY.

5. LASTLY, PLEASE KEEP THIS EMBASSY INFORMED OF ANY FURTHER ACTION BEING TAKEN OR CONTEMPLATED BY WASHINGTON AGENCIES IN THIS MATTER. WE WERE UNAWARE OF AN ALLEGED JULY 12 U.S. REQUEST FOR INFORMATION FROM THE AUSTRIAN GOVERNMENT UNTIL IT WAS MENTIONED BY BOTH THE AUSTRIAN T.V. AND PRESS JULY 25 IN CONJUNCTION WITH THE REMOVAL OF AUSTRIAN WINES FROM U.S. RETAIL ESTABLISHMENTS. VON DOHN-GJERTSEN

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PAGE 01 VIENNA 10525 231204Z 5487
ACTION EUR-00 FOR BANK-GORTLER

INFO LOG-00 COPY-01 ADS-00 AID-00 INR-10 CIAE-00 EB-00
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R 231243Z JUL 85
FM AMEMBASSY VIENNA
TO SECSTATE WASHDC 9181
INFO AMEMBASSY BONN
AMCONSUL HAMBURG

UNCLAS VIENNA 10525

TREASURY WASHDC FOR ALCOHOL TOBACCO AND FIREARMS
FOOD AND DRUG ADMIN WASHDC
PASS ELECTRONICALLY USDA/FAS

E.O. 12356: N/A
TAGS: EAGR, AU
SUBJECT: ADULTERATED WINE FROM AUSTRIA

REF: VIENNA 10336, BONN 21896

1. AG COUNSELOR MET JUNE 22 WITH FEDERAL ECONOMIC CHAMBER AND MINISTRY OF AGRICULTURE OFFICIALS TO DISCUSS THE GROWING AUSTRIAN WINE SCANDAL.
2. AS OF JUNE 22, ABOUT 4.7 MILLION LITERS OF WINE CONTAINING DIETHYLENE GLYCOL (DG) HAD BEEN DISCOVERED AND CONFISCATED BY AUSTRIAN AUTHORITIES. THE MINISTRY ESTIMATES THAT ONLY ABOUT 1.0 TO 1.3 PERCENT OF WINE PRODUCTION WAS ADULTERATED, AND WAS BASICALLY THE LATE HARVEST SWEET WINES. MOST OF THIS WINE WAS BOTTLED IN THE PROVINCE OF BURGENLAND, BUT SOME HAS BEEN DISCOVERED IN THE NEIGHBORING PROVINCE OF NIEDEROESTERREICH.
3. ACCORDING TO BOTH THE CHAMBER AND MINISTRY, FOUR OF THE 38 SUSPECTS HAVE BEEN ARRESTED, WHICH APPARENTLY MEANS IT WAS FEARED THAT THEY WOULD FLEE AUSTRIA. THE OTHER 34, OF WHICH 30 ARE PRODUCER/WHOLESALERS, AND 4 RETAILERS, WILL APPARENTLY HAVE A CHANCE AT THEIR TRIAL TO PROVE THEIR INNOCENCE.
4. ACCORDING TO THE MINISTRY, DG-LACED WINE HAS THE SAME CHARACTERISTICS AS THE NATURAL PRODUCT WHEN ADDED TO WHAT IS NORMALLY A RICH SUGAR CONTENT WINE. IT WAS THIS FACT THAT PREVENTED THE MINISTRY FROM DETECTING DG UNTIL A TEST WAS FINALLY DEVISED ON APRIL 24, ALTHOUGH IT HAD BEEN TIPPED OFF TO THE PROBLEM IN EARLY APRIL.
5. BOTH THE CHAMBER AND MINISTRY CONFIRMED THE INFORMATION PROVIDED IN REF BONN CABLE.
6. ACCORDING TO THE MINISTRY, THE AUSTRIAN EMBASSIES IN THOSE COUNTRIES RECEIVING THE ADULTERATED WINE WILL BE SENT AN OFFICIAL COMMUNICATION BY JULY 25 FOR TRANSMITTAL TO THE COMPETENT AUTHORITIES IN EACH COUNTRY. THIS WILL INCLUDE THE LIST OF 38 FIRMS (BASED ON THE 4.7 MILLION LITERS ALREADY CONFISCATED), LABELS AND VINTAGES INVOLVED, TESTING METHODS USED TO DETECT DG, AND AN OFFER TO CERTIFY BY TEST ALL FUTURE SHIPMENTS AS BEING DG FREE. IT IS SUSPECTED THAT THE ADULTERATION MAY GO BACK AS FAR AS THE 1980 VINTAGE, BUT THERE IS NO CONCRETE PROOF, AS YET, OF THIS.
7. AS ONE WOULD SUSPECT, WRONG-DOING BY RELATIVELY FEW IS CAUSING AND WILL CAUSE GREAT ECONOMIC DAMAGE TO THE THOUSANDS OF SMALL WINE PRODUCERS, OVER 40 THOUSAND, ACCORDING TO THE MINISTRY IN AUSTRIA. NORMALLY ABOUT 15 PERCENT OF PRODUCTION IS EXPORTED, OF WHICH 60 PERCENT GOES TO WEST GERMANY, MAINLY AS BULK WINE.
8. THE MINISTRY OF AGRICULTURE IS HOLDING AN OFFICIAL CONFERENCE ON THE PROBLEM THURSDAY MORNING JULY 25 TO WHICH ALL EMBASSIES CONCERNED ARE INVITED.

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INFO LOG-00 COPY-01 ADS-00 EB-08 L-03 HHS-06 AGR-01
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FM AMEMBASSY BONN
TO SECSTATE WASHDC 7585
INFO AMEMBASSY VIENNA
EC COLLECTIVE
FRG COLLECTIVE
TREASURY WASHDC

UNCLAS BONN 23241

DEPARTMENT PASS HHS, FDA, USDA ELECTRONICALLY

TREASURY FOR ALCOHOL, TOBACCO AND FIREARMS

USDA FOR TECHNICAL OFFICE, FAS

E.O. 12356: N/A
TAGS: GE, TBIO, ETRD, HSCA
SUBJECT: ADULTERATED GERMAN WINES

REF: A. BONN 20160; B. BONN 21665

AO
AA/ITP - 4
TTPEAD - 2
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1. SUMMARY: TWELVE GERMAN WINES HAVE BEEN FOUND TO DATE WHICH CONTAIN DIETHYLENE GLYCOL - A COMPOUND SIMILAR TO ANTIFREEZE. GROWING PUBLIC CONCERN OVER THE SCANDAL HAS FORCED THE MINISTRY OF YOUTH, FAMILY AND HEALTH TO PROPOSE TIGHTENED CONTROLS FOR BOTH IMPORTED AND DOMESTIC WINES. THESE INCLUDE A REQUIREMENT FOR EXTENSIVE CHEMICAL ANALYSIS OF IMPORTED WINES AND A REDUCTION IN THE NUMBER OF CUSTOMS CENTERS ABLE TO ADMIT WINE. THE MINISTRY OF FOOD, AGRICULTURE AND FORESTRY (BMELF) IS PARTICULARLY CONCERNED TO AVOID UNFAIR DAMAGE TO THE GERMAN WINE INDUSTRY. TO ALLAY SUSPICIONS OF WIDESPREAD IRREGULARITIES, THE BMELF IS SUPERVISING THE TESTING OF THOUSANDS OF GERMAN WINES AND IS WEIGHING THE INTRODUCTION OF AN ADDITIONAL EXPORT SHIPPING DOCUMENT THAT WOULD ASSURE FOREIGN NATIONS THAT EXPORTED GERMAN WINES WERE DG-FREE. AN UNCERTAIN QUANTITY OF DG-LACED AUSTRIAN WINE REMAINS ON THE GERMAN MARKET. HOWEVER, THE HEALTH AUTHORITIES HAVE NOT YET BEEN ABLE TO DISCOVER A SINGLE VERIFIABLE CASE OF POISONING. END SUMMARY

2. AS OF AUGUST 6, TWELVE GERMAN WINES HAVE BEEN FOUND THAT CONTAIN BETWEEN 0.03 AND 2.5 GRAMS PER LITER OF DIETHYLENE GLYCOL - A COMPOUND RELATED TO ETHYLENE GLYCOL (ANTIFREEZE). THE WINES ORIGINATE FROM THREE DISTRIBUTORS WHO ALSO HAPPEN TO BE MAJOR IMPORTERS OF AUSTRIAN WINE. THE GERMAN WINE APPEARS TO HAVE BEEN ADULTERATED WHEN IT WAS MIXED WITH AUSTRIAN WINE IN ORDER TO SWEETEN IT AND PASS IT OFF AS A QUALITY VARIETAL (REFTEL). CURRENTLY THE GERMAN AUTHORITIES ARE CHARGING THE DISTRIBUTORS WITH VIOLATIONS OF THE WINE-LABELING LAWS AND NOT WITH INTENTIONAL POISONING.

3. GROWING PUBLIC CONCERN OVER THE SCANDAL HAS ALREADY FORCED THE HEALTH AUTHORITIES HASTILY TO RE-EVALUATE EXISTING CONTROL PROCEDURES. AT A JULY 27 JOINT MEETING OF THE BUNDESTAG FOOD AND HEALTH COMMITTEES, BMJFG MINISTER HEINER GEISSLER PROPOSED MEASURES TO TIGHTEN CONTROLS ON IMPORTED AND DOMESTIC WINE.

4. THE NEW RULES, WHICH WILL REQUIRE THE APPROVAL OF THE BUNDESRAT TO TAKE EFFECT, INCLUDE:

A -- REQUIRING GERMAN STATES TO NOTIFY IMMEDIATELY THE FEDERAL HEALTH AUTHORITIES OF THE DISCOVERY OF ANY HEALTH-RELATED INFRACTION OF THE WINE LAWS. (BMJFG ASSISTANT SECRETARY WERNER CHORY FIRST LEARNED OF THE PRESENT SCANDAL THROUGH THE PRESS.)

B -- REDUCING DRASTICALLY THE NUMBER OF CUSTOMS CENTERS CAPABLE OF CLEARING IMPORTED WINE FROM THE PRESENT 270.

C -- EXPANDING EQUIPMENT AND PERSONNEL IN WINE-TESTING LABORATORIES.

D -- OPPOSING ALL EC ATTEMPTS TO LOOSEN EXISTING WINE REGULATIONS.

E -- PROPOSING STRINGENT EC LABELING REQUIREMENTS FOR ALL WINE ADDITIVES.

F -- REQUIRING ALL AUSTRIAN WINE IMPORTS TO BE BOTTLED WITHIN AUSTRIA AND CARRY GOVERNMENT GUARANTEES THAT THEY DO NOT CONTAIN DG.

G -- REQUIRING AUSTRIA TO PROVIDE IMMEDIATE WRITTEN NOTIFICATION OF ANY DISCOVERED ADULTERATION TO BOTH THE GERMAN FEDERAL GOVERNMENT AND INDIVIDUAL STATES (THE AUSTRIAN GOVERNMENT AT FIRST TELEPHONED ONLY THE NORTH RHINE-WESTPHALIA STATE AUTHORITIES).

H -- REQUIRING EXTENSIVE CHEMICAL EXAMINATIONS FOR IMPORTED WINES TO INSURE THAT SIMILAR FUTURE ADULTERATIONS DO NOT OCCUR.

5. OTTO NOEBLE, ACTING DIRECTOR OF THE OFFICE OF CONSUMER PROTECTION AND FOOD QUALITY OF THE MINISTRY OF FOOD, AGRICULTURE AND FORESTS (BMELF), INDICATED THAT THE PROPOSALS HAD MET WITH NO RESISTANCE FROM THE BUNDESTAG COMMITTEES. HOWEVER, SEVERAL SPD REPRESENTATIVES STATED THAT THE MEASURES DO NOT GO FAR ENOUGH TO POLICE WINE DISTRIBUTORS. THE FACTION RESERVED THE RIGHT TO AUGMENT THE PROPOSALS WHEN THE BUNDESTAG MEETS. NOEBLE ADDED THAT THE BMELF WAS VERY CONCERNED TO AVOID UNFAIR DAMAGE TO THE GERMAN WINE INDUSTRY. BECAUSE OF THE SCANDAL, THE MINISTRY WAS COORDINATING THE ANALYSIS OF THOUSANDS OF GERMAN WINES AS QUICKLY AS POSSIBLE IN ORDER TO ALLAY SUSPICIONS OF WIDESPREAD IRREGULARITIES. FURTHERMORE, THE BMELF WAS WEIGHING THE INTRODUCTION OF AN ADDITIONAL FRG SHIPPING DOCUMENT THAT WOULD ASSURE FOREIGN NATIONS THAT EXPORTED GERMAN WINE CONTAINED NO DG.

6. IN A RELATED DISCUSSION, DR. KARL EVERS, DIRECTOR OF THE OFFICE OF BEVERAGE CHEMISTRY AND HYGIENE OF THE MINISTRY OF YOUTH, FAMILY AND HEALTH, STATED THAT DESPITE THE PRESS FUROR, THE MINISTRY HAD NOT VERIFIED A SINGLE CASE OF DG POISONING IN THE FRG. HE ATTRIBUTED THIS TO THE TIMELY SEIZURE OF AUSTRIAN SHIPMENTS BY CUSTOMS AUTHORITIES AND TO THE FACT THAT GERMAN WINE DISTRIBUTORS KEPT METICULOUS CUSTOMER RECORDS, WHICH FACILITATED RECOVERY. IN ADDITION, EVEN CONFISCATED AUSTRIAN WINES GENERALLY CONTAINED LESS THAN TWO GRAMS OF DG PER LITER. CONTRARY TO INITIAL PRESS REPORTS, A FATAL DOSE OF DG IS CONSIDERED TO BE APPROXIMATELY ONE GRAM ABSORBED INTO THE SYSTEM FOR EACH KILOGRAM OF BODY WEIGHT. CONSUMPTION OF TWO GRAMS WOULD NOT EVEN PRODUCE CLINICALLY DETECTABLE EFFECTS IN AN AVERAGE ADULT.

7. THE BMJFG BELIEVES THAT SOME QUANTITY OF ADULTERATED AUSTRIAN WINES (ALMOST ALL THE AFFECTED GERMAN WINES HAVE BEEN ACCOUNTED FOR) REMAIN IN PRIVATE HANDS. HOWEVER, IT IS HOPING THAT THE SATURATION MEDIA COVERAGE

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WILL MAKE CONSUMERS WARY OF DRINKING ANY AUSTRIAN WINES WITHOUT FIRST CHECKING WITH THE HEALTH AUTHORITIES. HESSIAN STATE AUTHORITIES HAVE ASKED WINE DEALERS TO INFORM THEM OF THEIR SUSPECTED WINE STOCKS FROM AUSTRIA'S BURGENLAND BUT NOT TO OVERLOAD WATER TREATMENT FACILITIES BY POURING THE WINES INTO THE SEWER.

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INFO AMCONSUL HAMBURG
AMEMBASSY VIENNA
TREASURY WASHDC
USFDA ROCKVILLE MD

UNCLAS BONN 25672

PASS ELECTRONICALLY USDA/FAS FOR F&V AND ITP TECHNICAL
OFFICE; HAMBURG FOR ATO; VIENNA FOR AGCOUNSELOR; TREASURY
FOR ALCOHOL, TOBACCO AND FIREARMS; FDA ATTN COKER.

E.O. 12356: N/A
TAGS: EAGR, GE
SUBJECT: GERMAN WINES ADULTERATED WITH DIETHYLENE GLYCOL

REF: BONN 25190

1.  FEDMINHEALTH'S PRESENT LIST OF GERMAN WINES
ADULTERATED WITH DIETHYLENE GLYCOL (DG) STANDS AT A TOTAL
OF 50 WINES PLUS 1 SEKT.  FOLLOWING ARE 8 ADDITIONAL
WINES RECENTLY ADDED TO THE LIST OVER AND ABOVE THOSE
PREVIOUSLY REPORTED.  STATUS AS OF 8/27/1985:

NO. 43: 1978 NIERSTEINER GUTES DOMTAL, SPAETLESE, AP NO.
425223521385, BOTTLED BY PETER LANG, ALSHEIM., DG CONTENT
0.11 GRAMS/LITER.

NO. 44: 1983 MONSHEIMER SILBERBERG, HUXELREBE,
BEERENAUSLESE, RHEINHESSEN, AP NO. 425223543884, BOTTLED
BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.135 GRAMS/LITER.

NO. 45: 1983 ALSHEIMER FRUEHMESSE, SCHEUREBE, SPAETLESE,
RHEINHESSEN, AP NO. 425223541284, BOTTLED BY WALTER
SEIDEL, ALSHEIM, DG CONTENT 0.02 GRAMS/LITER.

NO. 46: 1983 HAMBACHER PFAFFENGRUND,
SPAETBURGUNDER-WEISSHERBST, BEERENAUSLESE, RHEINPFALZ, AP
NO. 525223502185, BOTTLED BY M. THOMAS WEINBAU, ALSHEIM,
DG CONTENT 0.38 GRAMS/LITER.

NO. 47: 1983 BURG LAYER JOHANNISBERG, RIESLING,
SPAETLESE, NAHE, AP NO. 1907183384, BOTTLED BY F.
PIEROTH, BURG LAYEN, DG CONTENT 0.02 GRAMS/LITER.

NO. 48: 1983 MUENSTERER STEINKOPF, RIESLING, AUSLESE,
NAHE, AP NO. 15071832384, BOTTLED BY F. PIEROTH, BURG
LAYEN, DG CONTENT 0.03 GRAMS/LITER.

NO. 49: 1983 BINGERBRUECKER ROEMERBERG, RIESLING,
SPAETLESE, NAHE, AP NO. 19071831884, BOTTLED BY F.
PIEROTH, BURG LAYEN, DG CONTENT 0.02 GRAMS/LITER.

NO. 50: 1983 ALSHEIMER FRUEHMESSE, SCHEUREBE, SPAETLESE,
RHEINHESSEN, AP NO. 42522350585, BOTTLED BY WALTER
SEIDEL, ALSHEIM, DG CONTENT 0.02 GRAMS/LITER.

2.  FEDMINHEALTH HAS NO INFORMATION WHETHER ANY OF THE
CONTAMINATED WINES HAVE BEEN EXPORTED TO THE UNITED
STATES.  DOBBINS
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ITT[illegible]AD - 2
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USFDA ROCKVILLE MD

UNCLAS SECTION 01 OF 06 BONN 32672

PASS ELECTRONICALLY USDA/FAS FOR FLV AND ITP TECHNICAL OFFICE; HAMBURG FOR ATO; VIENNA FOR AGCOUNSELOR; TREASURY FOR ALCOHOL, TOBACCO AND FIREARMS; FDA ATTN COHEN.

E.O. 12356: N/A
TAGS: EAGR, GE
SUBJECT: GERMAN WINES ADULTERATED WITH DIETHYLENE GLYCOL

1. FEDMINHEALTH HAS RECENTLY PUBLISHED A NEW LIST OF WINES ADULTERATED WITH DIETHYLENE GLYCOL. THE NEW LIST SHOWS 1347 WINES OF WHICH 76 ARE GERMAN. LISTING OF THE GERMAN WINES, ORDERED ALPHABETICALLY BY YEAR FOLLOWS.

SCHAUMWEIN, ALBIGER PETERSBERG, LAGENSEKT, RHEINHESSEN, B 101188, B 1011881, 27402, BOTTLED BY SEKTKELLEREI SCHLOSS BOECKELHEIM A.D. NAHE, DG CONTENT 0.26-0.3 GRAMS/LITER.

1976 ALZEYER SYBILLENSTEIN, AUSLESE, QUALITAETSWEIN MIT PRAEDIKAT, AP NO. 49071134079, BOTTLED BY FERDINAND PIEROTH, BURG LAYEN, DG CONTENT 0.3 GRAMS/LITER.

1976 BADENHEIMER ST. ROCHUS-KAPELLE, AUSLESE, RHEINHESSEN, AP NO. 49071842381, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.1 GRAMS/LITER.

1976 FRAMERSHEIMER KREUZWEG, RUHLAENDER, BEERENAUSLESE, RHEINHESSEN, AP NO. 4907183380, BOTTLED BY FERDINAND PIEROTH, BURG LAYEN, DG CONTENT 0.6 GRAMS/LITER.

1976 FRAMERSHEIMER KREUZWEG, BEERENAUSLESE, RHEINHESSEN, AP NO. 4907133358, BOTTLED BY PIEROTH, BURG LAYEN, DG CONTENT 0.6 GRAMS/LITER.
1976 GAU-ODERNHEIMER PETERSBERG, BEERENAUSLESE, RHEINHESSEN, AP NO. 4907183298, BOTTLED BY PIEROTH, BURG LAYEN, DG CONTENT 0.05.

1976 GAU-ODERNHEIMER VOGELSANG, BEERENAUSLESE, RHEINHESSEN, AP NO. 49071841779, BOTTLED BY NIEDERTHAELER HOF, DG CONTENT 1,077 GRAMS/LITER.

1976 MITTELHEIMER EDELMANN, RIESLING, BEERENAUSLESE, MOSEL-SAAR-RUWER, AP NO. 2604000537, BOTTLED BY PIEROTH, BURG LAYEN, DG CONTENT 0.39 GRAMS/LITER.

1976 MITTELHEIMER EDELMANN, BEERENAUSLESE, MOSEL-SAAR-RUWER, AP NO. 2604000577, BOTTLED BY RAINER SIEBEN WEINHANDELS GMBH, ALTBUERGERMEISTER HANS BASTING NACHFOLGER, OESTRICH-WINKEL, DG CONTENT 0.3 GRAMS/LITER.

1978 ALBIGER PETERSBERG, KANZLER, AUSLESE, RHEINHESSEN, AP. NO. 4907184279, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.2 GRAMS/LITER.

1978 ALBIGER PETERSBERG, AUSLESE, RHEINHESSEN, AP NO. 49071841879, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.37 GRAMS/LITER.

1978 BECHTOLSHEIMER PETERSBERG, SPAETLESE, RHEINHESSEN, AP NO. 49071841379, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.07 GRAMS/LITER.

1978 GUTENBERGER PFAFFGARTEN, QUALITAETSWEIN MIT PRAEDIKAT, EISWEINAUSLESE, AP NO. 19071842579, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.05 GRAMS/LITER.

1978 NIERSTEINER GUTES DOMTAL, SPAETLESE, RHEINHESSEN, AP NO. 4252235313, BOTTLED BY PETER LANG, ALSHEIM, DG CONTENT 0.1? GRAMS/LITER.
LOIGER PETERSBERG BACCHUS, SPAETLESE, AP NO. N.A., BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.06.

1979 ALBIGER PETERSBERG, AUSLESE, RHEINHESSEN, AP NO. 49071384881, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.04 GRAMS/LITER.
1979 ALZEYER SYBILLENSTEIN, ORTEGA UND SIEGERREBE, AUSLESE, RHEINHESSEN, AP NO. 49071136388, BOTTLED BY FERDINAND PIEROTH, BURG LAYEN, DG CONTENT 0.32 GRAMS/LITER.

1979 BECHTOLSHEIMER PETERSBERG, FABERREBE ALBALONGA, SPAETLESE, RHEINHESSEN, AP NO. 49071842581, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.6 GRAMS/LITER.

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USFDA ROCKVILLE MD

UNCLAS SECTION 02 OF 06 BONN 32672

PASS ELECTRONICALLY USDA/FAS FOR F&V AND ITP TECHNICAL OFFICE; HAMBURG FOR ATO; VIENNA FOR AGCOUNSELOR; TREASURY FOR ALCOHOL, TOBACCO AND FIREARMS; FDA ATTN COMER.

E.O. 12356: N/A
TAGS: EAGR, GE
SUBJECT: GERMAN WINES ADULTERATED WITH DIETHYLENE GLYCOL

1979 DEIDESHEIMER HOFSTUECK, RIESLING, SPAETLESE, RHEINPFALZ, AP NO. 53022631001, BOTTLED BY KURFUERSTENHOF WEINKELLEREI NIERSTEIN, DG CONTENT 0.019 GRAMS/LITER.

1979 GAU-WEINHEIMER KURFUERSTENSTUECK, BEERENAUSLESE, RHEINHESSEN, AP NO. 4507104900, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT UP TO 0.2 GRAMS/LITER.

1979 HAINFELDER ORDENSGUT, KERNER SCHEUREBE, SPAETLESE, RHEINGAU, AP NO. 59077033902, BOTTLED BY FERDINAND PIEROTH, BURG LAYEN, DG CONTENT 0.013 GRAMS/LITER.

1979 KERNER SCHEUREBE, SPAETLESE, AP NO. 59077033902, BOTTLED BY FERDINAND PIEROTH, BURG LAYEN, DG CONTENT 0.013 GRAMS/LITER.

1979 LEINSWEILER HERLICH HUXEL UND ORTEGA, BEERENAUSLESE, RHEINPFALZ, AP NO. 59071336100, BOTTLED BY FERDINAND PIEROTH, BURG LAYEN, DG CONTENT 0.04 GRAMS/LITER.

1979 WINDENER KLOSTER LIEBFRAUENBERG ORTEGA UND SCHEUREBE, BEERENAUSLESE, RHEINPFALZ, AP NO. 5302263300, BOTTLED IN LANGENLONSHEIM BY KURFUERSTENHOF WEINKELLEREI NIERSTEIN, DG CONTENT 0.17 GRAMS/LITER.
NIERSTEIN, DG CONTENT 0.17 GRAMS/LITER.

1980 ALBIGER PETERSBERG, AUSLESE, RHEINHESSEN, AP NO. 49071043401, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.02 GRAMS/LITER.

1980 FRAMERSHEIMER KREUZWEG HUXELREBE, SPAETLESE, RHEINHESSEN, AP NOS. 49071229131, 49071233722, BOTTLED BY PIEROTH, BURG LAYEN, DG CONTENT 0.02-0.03 GRAMS/LITER.

1980 GAU-ODERNHEIMER VOGELSANG, OPTIMA UND ORTEGA, AUSLESE, RHEINHESSEN, AP NO. 49071242381, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.71 GRAMS/LITER.
1981 ALBIGER PETERSBERG, TROCKENBEERENAUSLESE, RHEINHESSEN, AP NO. 49071241432, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.11 GRAMS/LITER.

1982 ALSHEIMER RHEINBLICK KERNER, AUSLESE, RHEINHESSEN, AP NO. 425223542603, BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.012 GRAMS/LITER.

1982 BURGSPONHEIMER ROSENGARTEN, SPAETLESE, NAHE, AP NO. 19071041983, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.03 GRAMS/LITER.

1982 HEIMERSHEIMER SONNENHANG, NEUZUCHT, BEERENAUSLESE, RHEINHESSEN, AP NO. 425223543504, BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.5 GRAMS/LITER.

1982 KERNER, AUSLESE, RHEINHESSEN, AP NO. 425223540603, BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.012 GRAMS/LITER.

1982 TRABENER WUERZGARTEN, RIESLING, AUSLESE, AP NOS. 290746427003, 290746480003, BOTTLED BY RICHARD LANGGUTH, TRABEN-TRARBACH/MOSEL, DG CONTENT 0.044-0.072 GRAMS/LITER.

1982 UERZIGER SCHWAR..AY, AUSLESE, MOSEL-SAAR-RUWER, AP NOS. 290746480903, 290746427103, BOTTLED BY RICHARD LANGGUTH, TRABEN-TRARBACH/MOSEL, DG CONTENT 0.026-0.073 GRAMS/LITER.

1982 AUSLESE, AP NO. 290746427103, BOTTLED BY LANGGUTH ERBEN, TRABEN-TRARBACH, DG CONTENT 0.026 GRAMS/LITER.
ERBEN, TRABEN-TRARBACH, DG CONTENT 0.026 GRAMS/LITER.

1983 ALBIGER PETERSBERG OPTIMA, BEERENAUSLESE, RHEINHESSEN, AP NO. 4907104904, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.13-0.2 GRAMS/LITER.

1983 ALBIGER PETERSBERG, KERNER, AUSLESE, RHEINHESSEN, AP NO. 49071041304, BOTTLED BY NIEDERTHAELER HOF, SCHLOSSBOECKELHEIM, DG CONTENT 0.02 GRAMS/LITER.

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USFDA ROCKVILLE MD

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PASS ELECTRONICALLY USDA/FAS FOR FAS AND OIP TECHNICAL OFFICE; HAMBURG FOR ATO; VIENNA FOR AGCOUNSELOR; TREASURY FOR ALCOHOL, TOBACCO AND FIREARMS; FDA WITH COHEN

E.O. 12356: N/A
TAGS: EAGR, GE
SUBJECT: GERMAN WINES ADULTERATED WITH DIETHYLENE GLYCOL

1983 ALSHEIMER FRUEHMESSE SCHEUREBE, SPAETLESE, RHEINHESSEN, AP NOS. 42522750585, 42522350128, 42523008784, BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.02-0.061 GRAMS/LITER.

1983 ALSHEIMER RHEINBLICK SCHEUREBE, AUSLESE, RHEINHESSEN, AP NO. 42522061184, BOTTLED BY MICHAEL DIEHER, ALSHEIM, DG CONTENT 0.039 GRAMS/LITER.
1983 ALZEYER SYBILLENSTEIN, FABERREBE, SPAETLESE, AP NO. 4900710312784, BOTTLED BY FERDINAND PIEROTH, BURG LAYEN, DG CONTENT 0.016 GRAMS/LITER.

1983 BINGERBRUECKER ROEMERBERG HUXELREBE, AUSLESE, NAHE, AP NO. 19071631924, BOTTLED BY FERDINAND PIEROTH, BURG LAYEN, DG CONTENT 0.6 GRAMS/LITER.

1983 BINGERBRUECKER ROEMERBERG KERNER, AUSLESE, NAHE, AP NOS. 19071632004, 19071631356, BOTTLED BY FERDINAND PIEROTH, BURG LAYEN, DG CONTENT 0.019-0.3 GRAMS/LITER.

1983 BINGERBRUECKER ROEMERBERG, RIESLING HALBTROCKEN, SPAETLESE, NAHE, AP NOS. 19071631734, 19071631884, BOTTLED BY FERDINAND PIEROTH, BURG LAYEN, DG CONTENT 0.02-0.05 GRAMS/LITER.

1983 BURG LAYER JOHANNISBERG RIESLING, SPAETLESE, NAHE, AP NO. 1907163334, BOTTLED BY FERDINAND PIEROTH, BURG LAYEN, DG CONTENT 0.02 GRAMS/LITER.

1983 BURG LAYER JOHANNISBERG WEISSBURGUNDER, EISWEIN, NAHE, AP NO. 19071634504, BOTTLED BY FERDINAND PIEROTH, BURG LAYEN, DG CONTENT 0.9 GRAMS/LITER.
83 BURG LAYER SCHLOSSBERG, RIESLING, SPAETLESE, NAHE, BOTTLED BY FERDINAND PIEROTH, BURG LAYEN, DG CONTENT 0.01 GRAMS/LITER.

1983 DAHLSHEIMER BURG RODENSTEIN SCHEUREBE ORTEGA, SPAETLESE, RHEINHESSEN, AP NO. 42522350085, DG CONTENT 0.033 GRAMS/LITER.

1983 DAHLSHEIMER BURG RODENSTEIN, MUELLER-THURGAU, AUSLESE, RHEINHESSEN, AP NO. 42522350785, ABHANDLUNG 252235 OU; BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.26-0.3 GRAMS/LITER.

1983 DUERKHEIMER FEUERBERG, AUSLESE, RHEINPFALZ, AP NO. 52522356654, BOTTLED BY PETER LAHR, ALSHEIM, DG CONTENT 0.2 GRAMS/LITER.

1983 FRAMERSHEIMER KREUZWEG, HUXELREBE, AUSLESE, RHEINHESSEN, AP NO. 4907124285, BOTTLED BY WIEDERTHALER HOF, SCHWABSBURG, DG CONTENT 0.2 GRAMS/LITER.
1983 FRAMERSHEIMER KREUZWEG, HUXELREBE, TROCKENBEERENAUSLESE, AP NO. 42360140534, BOTTLED BY WEINGUT ROEMERHOF K.A. MENGER, GAU-ODERNHEIM, DG CONTENT 0.014 GRAMS/LITER.

1983 FREINSHEIMER ROSENBUEHL, AUSLESE, RHEINPFALZ, AP NO. 52522351388, BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.056 GRAMS/LITER.

1983 GAU-BOCKENHEIMER VOGELSANG HUXELREBE ORTEGA, BEERENAUSLESE, RHEINHESSEN, AP NO. 49071591388, BOTTLED BY PIEROTH, BURG LAYEN, DG CONTENT 0.12-0.18 GRAMS/LITER.

1983 GAU-ODERNHEIMER FUCHSLOCH, AUSLESE, RHEINHESSEN, AP NO. 42360140354, BOTTLED BY WEINGUT ROEMERHOF, K.A. MENGER, GAU-ODERNHEIM, DG CONTENT 0.114 GRAMS/LITER.

1983 GAU-ODERNHEIMER PETERSBERG HUXELREBE, TROCKENBEERENAUSLESE, AP NO. 42360140534, BOTTLED BY WEINGUT ROEMERHOF, K.A. MENGER, GAU-ODERNHEIM, DG CONTENT 0.016 GRAMS/LITER.

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TREASURY WASHDC
USFDA ROCKVILLE MD

UNCLAS SECTION 04 OF 06 BONN 32672

PASS ELECTRONICALLY USDA/FAS FOR F&V AND ITP TECHNICAL OFFICE; HAMBURG FOR ATO; VIENNA FOR AGCOUNSELOR; TREASURY FOR ALCOHOL, TOBACCO AND FIREARMS; FDA ATTN COHER.

E.O. 12356: N/A
TAGS: EAGR, GE
SUBJECT: GERMAN WINES ADULTERATED WITH DIETHYLENE GLYCOL

1983 HAMBACHER PFAFFENGRUND GEWUERZTRAMINER, BEERENAUSLESE, RHEINPFALZ, AP NO. 525223501785, PRODUCED BY RUPRECHT ERBEN, WEINKELLEREI KALLSTADT/PFALZ AND BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 1.8 GRAMS/LITER.

1983 HAMBACHER PFAFFENGRUND SILVANER UND ORTEGA, BEERENAUSLESE, RHEINPFALZ, AP NO. 525223501885, PRODUCED BY RUPRECHT ERBEN, WEINKELLEREI KALLSTADT/PFALZ AND BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.8 GRAMS/LITER.

1983 HAMBACHER PFAFFENGRUND SPAETBURGUNDER WEISSHERBST, BEERENAUSLESE, RHEINPFALZ, AP NO. 525223502185, PRODUCED BY H. THOMAS WEINBAU-WEINKELLEREI, ALSHEIM/RHEINHESSEN, BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.08 GRAMS/LITER.

1983 WEINERSHEIMER SONNENHANG, NEUZUCHT, BEERENAUSLESE, RHEINHESSEN, AP NO. 425223543484, BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.03 GRAMS/LITER.

1983 MAIKAMMERER MANDELHOEHE, GEWUERZTRAMINER, BEERENAUSLESE, RHEINPFALZ, AP NOS. 55071325824, AP 507183, 07133054, 5815-4, BOTTLED BY KURFUERSTEN WEINKELLEREI NIERSTEIN, DG CONTENT 0.2 GRAMS/LITER.
1983 MONHEIMER SILBERBERG HUXELREBE, QUALITAETSWEIN MIT PRAEDIKAT, BEERENAUSLESE, RHEINHESSEN, AP NO. 425223543684, NOT-BRAND [illegible], BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.135 GRAMS/LITER.

1983 MUENSTERER STEINKOPF RIESLING, AUSLESE, NAHE, AP NO. [illegible], BOTTLED BY PIEROTH, BURG LAYEN, DG CONTENT 0.03 GRAMS/LITER.

1983 MUENSTERER STEINKOPF RIESLING HALBTROCKEN, SPAETLESE, NAHE, AP NO. [illegible], BOTTLED BY PIEROTH, BURG LAYEN, DG CONTENT 0.15 GRAMS/LITER.

1983 OBERROTWEILER EICHBERG RULAENDER, TROCKENBEERENAUSLESE, BADEN, AP NO. [illegible], BOTTLED BY WEINGUT STIEFERT, OBERROTWEIL A.K., DG CONTENT 0.063 GRAMS/LITER.

1983 OPPENHEIMER KROETENBRUNNEN, SPAETLESE, RHEINHESSEN, AP NO. [illegible], BOTTLED BY WEINKELLEREI KURPRINZ, MAINZ, DG CONTENT 0.014 GRAMS/LITER.

1983 OPPENHEIMER KROETENBRUNNEN, SPAETLESE, RHEINHESSEN, AP NO. 490730103085, BOTTLED BY RICHARD HAAS, RUEDESHEIM/NAHE, DG CONTENT 0.13 GRAMS/LITER.

1983 ORTEGA, SPAETLESE, RHEINHESSEN, AP NO. 425223509085, BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.087 GRAMS/LITER.

1983 RHEINPFALZ, AUSLESE, AP NO. 525223515084, BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.056 GRAMS/LITER.

1983 SCHEUREBE, AUSLESE, AP NO. 425220061184, BOTTLED BY MICHAEL RIEMER, ALSHEIM, DG CONTENT 0.039 GRAMS/LITER.

1983 WACHENHEIMER DOMBLICK HUXELREBE, BEERENAUSLESE, RHEINHESSEN, AP NO. 425223510485, BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 3.6 GRAMS/LITER.

1983 WESTHOFENER BERGKLOSTER HUXELREBE, BEERENAUSLESE, RHEINHESSEN, AP NOS. 425223546484, 425233546484, 425223554684, BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 1.3-2.5 GRAMS/LITER.
1983 WESTHOFENER BERGKLOSTER RIESLING, AUSLESE, RHEINHESSEN, AP NO. 425223526984, BOTTLED BY WALTER SEIDEL, ALSHEIM, DG CONTENT 0.2 GRAMS/LITER.

1983 WOELLSTEINER RHEINGRAFENSTEIN, SPAETLESE, AP NO. 490502280284, BOTTLED BY ST. BONIFATIUS, RUEDESHEIM/RHEIN, DG CONTENT 0.07 GRAMS/LITER.

1983 WORMSER LIEBFRAUENMORGEN HUXEL, BEERENAUSLESE,

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PAGE 01 BONN 32672 05 OF 06 291818Z 6635

ACTION AGR-01

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TREASURY WASHDC
USFDA ROCKVILLE MD

UNCLAS SECTION 05 OF 06 BONN 32672

PASS ELECTRONICALLY USDA/FAS FOR F&V AND ITP TECHNICAL OFFICE; HAMBURG FOR ATO; VIENNA FOR AGCOUNSELOR; TREASURY FOR ALCOHOL, TOBACCO AND FIREARMS; FDA ATTN COKER.

E.O. 12356: N/A
TAGS: EAGR, GE
SUBJECT: GERMAN WINES ADULTERATED WITH DIETHYLENE GLYCOL

RHEINHESSEN, AP NO. 425223543684, BOTTLED BY WALTER SEIBEL, ALSHEIM, DG CONTENT 0.1 GRAMS/LITER.

1984 KALLSTADTER STEINACKER SIEGERREBE, BEERENAUSLESE, RHEINPFALZ, AP NO. 52522730185, BOTTLED BEI ERZEUGERGEMEINSCHAFT ALSHEIM, DG CONTENT 0.6 GRAMS/LITER.

1984 OPPENHEIMER KROETENBRUNNEN, QUALITAETSWEIN, RHEINHESSEN, AP NO. 490702129885, BOTTLED BY PETER MERTES, BERNKASTEL KUES, DG CONTENT 0.015 GRAMS/LITER.
BURT.

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PAGE 01 VIENNA 11968 191549Z
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R 191536Z AUG 85
FM AMEMBASSY VIENNA
TO DEPT OF TREASURY WASHDC
SECSTATE WASHDC 9580

UNCLAS VIENNA 11968

TREASURY FOR ALCOHOL, TOBACCO AND FIREARMS
PASS ELECTRONICALLY TO AGRICULTURE

E.O. 12356: N/A
TAGS: ETRD, AU
SUBJECT: WINE ADULTERATION

REF: STATE 249005

1. THE FOLLOWING SUPPLIES INFORMATION REQUESTED BY ALCOHOL, TOBACCO AND FIREARMS IN REFTEL.

2. HUNGARIAN WINE - AUSTRIAN AUTHORITIES ARE NOT SURE IF ADULTERATED PRIOR TO ARRIVING IN AUSTRIA OR AFTER, BUT BELIEVE IT IS THE LATTER. THE TWO ADULTERATED WINES WERE BOTTLED IN AUSTRIA FROM IMPORTED CHEAP BULK HUNGARIAN PRODUCT AND RESOLD AS HUNGARIAN ERLAUER CABERNET. THE AUTHORITIES DO NOT KNOW IF ANY OF THIS PRODUCT WAS RE-EXPORTED.

3. ITALIAN WINE - WINE LABLED VALPOLINELLA VINO DE QUALITA, ADULTERATED WITH DIETHYLENE GLYCOL, (D.G.) WAS FIRST FOUND IN A SUPERMARKET BELONGING TO THE ADEG CHAIN. AUSTRIAN AUTHORITIES NOW SUSPECT THAT PRODUCT WAS REALLY OF AUSTRIAN ORIGIN AND HAVE IMPOUNDED ALL SUCH LABELLED PRODUCT.

4. AUSTRIAN SEKT - ONE BRAND OF SPARKLING WINE BOTTLED BY THE AUSTRIAN FIRM INFUEHR IS SUSPECTED OF CONTAINING D.G. ALL OF THE PRODUCT HAS BEEN IMPOUNDED UNTIL TESTS CAN BE COMPLETED. SINCE THERE ARE MANY SAMPLES TO BE TESTED, IT MAY TAKE A LONG TIME TO DETERMINE WHETHER D.G. IS PRESENT OR NOT.

5. TO DATE, OVER 15 MILLION LITERS OF WINE HAVE BEEN IMPOUNDED BY AUSTRIAN AUTHORITIES, A THREE FOLD INCREASE SINCE EARLY JULY. THIS REPRESENTS 5 PERCENT OF PRODUCTION. FORTY PEOPLE ARE IN JAIL AND ANOTHER 116 ARE TO APPEAR IN COURT.

6. MORE DETAILS ARE NOT AVAILABLE BECAUSE THE RESPONSIBLE AUSTRIAN AUTHORITIES ARE ON VACATION FOR ANOTHER WEEK. VON DAMM-GUERTLER

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Austria - Wine

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INFO AMEMBASSY BONN
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UNCLAS VIENNA 13222

E.O. 12356/ N/A
TAGS/ EAGR ETRD AU
SUBJECT/ ADULTERATED ITALIAN WINE BOTTLED IN AUSTRIA

REF/ STATE 274835 (NOTAL)

1. IN RESPONSE TO REFTEL REQUEST, GOA AUTHORITIES HAVE PROVIDED US DETAILS ON ADULTERATED VALPOLICELLA WINE FOUND IN AUSTRIA.

2. TWO VARIETIES OF VALPOLICELLA WINES WERE FOUND ADULTERATED WITH DIETHYLENE GLYCOL (DG). THE FIRST WAS A RED WINE IN 1 LITER BORDEAUX BOTTLES. THE DG QUANTITY FOUND IN ONE SAMPLE WAS 0.05 GRAMS PER LITER. FOLLOWING IS DESCRIPTION OF LABELING. ON THE BOTTLE NECK THERE IS A WHITE STRIPE WITH GOLDEN EDGES. ON THE STRIPE IN BLACK LETTERS, THE FOLLOWING/ VALPOLICELLA DENOMINAZIONE DI ORIGINE CONTROLLATA. BELOW THE STRIPE IS THE MAIN LABEL. IT IS WHITE AND SHOWS A BLACK DRAWING OF AN ITALIAN YARD WITH BARRELS. THE WHOLE PICTURE IS IN A GOLDEN FRAME. ABOVE THE CENTER OF THE PICTURE IS WRITTEN/ VALPOLICELLA. BELOW THE PICTURE THE FOLLOWING IS WRITTEN/ IMPORT/ BRUDER KLEINOSCHEG, VINO DI QUALITA. FURTHER BELOW/ DEMONINAZIONE DI ORIGINE CONTROLLATA. FURTHER BELOW/ F.C.V.S.V., SAN BONIFACIO (VR). FURTHER BELOW/ ITALIA.

3. THE SECOND ADULTERATED VALPOLICELLA WAS A RED WINE IN 1 LITER BURGUNDY BOTTLES. THE DG QUANITY FOUND IN ONE SAMPLE WAS 0.35 GRAMS PER LITER. THERE IS ONLY THE MAIN LABEL, WHICH IS WHITE. IN BLACK LETTERS IS WRITTEN SAN DONATO, UNDERLINED IN GOLD. FURTHER BELOW IS A HERALDIC PICTURE OF A CROWN WHICH IS ON THE TOP OF A GRAPE AND A STAR. BELOW THE PICTURE IS WRITTEN/ VALPOLICELLA. FURTHER BELOW/ DENOMINAZIONE DI ORIGINE CONTROLLATA. FURTHER BELOW/ C.V.B.C. & C.S.P.A. FOSSALTA DI P. AFTER A GOLDEN LINE THE FOLLWING IS WRITTEN/ INPORT/ BRUDER KLEINOSCHEG - GRAZ.

4. ALL BOTTLES OF BOTH VARIETIES WERE IMPOUNDED. FURTHER SAMPLES WILL BE TESTED LATER. AUSTRIAN AUTHORITIES ASSUME THAT BOTH WINES WERE BOTTLED IN AUSTRIA, SINCE THE BOTTLES WERE OF DOMESTIC ORIGIN. THEY HAVE NO INFORMATION THAT THESE WINES WERE EXPORTED TO THE U.S. VON DAMM-GUERTLER

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R 231013Z JUL 85
FM AMEMBASSY VIENNA
TO SECSTATE WASHDC 9182
INFO AMEMBASSY BONN
AMCONSUL HAMBURG

UNCLAS VIENNA 10525

TREASURY WASHDC FOR ALCOHOL TOBACCO AND FIREARMS
FOOD AND DRUG ADMIN WASHDC
PASS ELECTRONICALLY USDA/FAS

E.O. 12356: N/A
TAGS: EAGR, AU
SUBJECT: ADULTERATED WINE FROM AUSTRIA

REF: VIENNA 12330, BONN 21296

1. EC COUNSELOR MET JUNE 22 WITH FEDERAL ECONOMIC CHAMBER AND MINISTRY OF AGRICULTURE OFFICIALS TO DISCUSS THE GROWING AUSTRIAN WINE SCANDAL.

2. AS OF JUNE 22, ABOUT 4.7 MILLION LITERS OF WINE CONTAINING DIETHYLENE GLYCOL (DG) HAD BEEN DISCOVERED AND CONFISCATED BY AUSTRIAN AUTHORITIES. THE MINISTRY ESTIMATES THAT ONLY ABOUT 1.0 TO 1.5 PERCENT OF WINE PRODUCTION WAS ADULTERATED, AND WAS BASICALLY THE LATE HARVEST SWEET WINES. MOST OF THIS WINE WAS BOTTLED IN THE PROVINCE OF BURGENLAND, BUT SOME HAS BEEN DISCOVERED IN THE NEIGHBORING PROVINCE OF NIEDEROESTERREICH.

3. ACCORDING TO BOTH THE CHAMBER AND MINISTRY, FOUR OF THE 38 SUSPECTS HAVE BEEN ARRESTED, WHICH APPARENTLY MEANS IT WAS FEARED THAT THEY WOULD FLEE AUSTRIA. THE OTHER 34, OF WHICH 30 ARE PRODUCERS/WHOLESALERS, AND 4 RETAILERS, WILL APPARENTLY HAVE A CHANCE AT THEIR TRIAL TO PROVE THEIR INNOCENCE.

4. ACCORDING TO THE MINISTRY, DG-LACED WINE HAS THE SAME CHARACTERISTICS AS THE NATURAL PRODUCT WHEN ADDED TO WHAT IS NORMALLY A HIGH SUGAR CONTENT WINE. IT WAS THIS FACT THAT PREVENTED THE MINISTRY FROM DETECTING DG UNTIL A TEST WAS FINALLY DEVISED ON APRIL 24, ALTHOUGH IT HAD BEEN TIPPED OFF TO THE PROBLEM IN EARLY APRIL.

5. BOTH THE CHAMBER AND MINISTRY CONFIRMED THE INFORMATION PROVIDED IN REF BONN CABLE.

6. ACCORDING TO THE MINISTRY, THE AUSTRIAN EMBASSIES IN THOSE COUNTRIES RECEIVING THE ADULTERATED WINE WILL BE SENT AN OFFICIAL COMMUNICATION BY JULY 25 FOR TRANSMITTAL TO THE COMPETENT AUTHORITIES IN EACH COUNTRY. THIS WILL INCLUDE THE LIST OF 38 FIRMS (BASED ON THE 4.7 MILLION LITERS ALREADY CONFISCATED), LABELS AND VINTAGES INVOLVED, TESTING METHODS USED TO DETECT DG, AND AN OFFER TO CERTIFY BY TEST ALL FUTURE SHIPMENTS AS BEING DG FREE. IT IS SUSPECTED THAT THE ADULTERATION MAY GO BACK AS FAR AS THE 1980 VINTAGE, BUT THERE IS NO CONCRETE PROOF, AS YET, OF THIS.

7. AS ONE WOULD SUSPECT, WRONG-DOING BY RELATIVELY FEW IS CAUSING AND WILL CAUSE GREAT ECONOMIC DAMAGE TO THE THOUSANDS OF SMALL WINE PRODUCERS, OVER 42 THOUSAND, ACCORDING TO THE MINISTRY IN AUSTRIA. NORMALLY ABOUT 35 PERCENT OF PRODUCTION IS EXPORTED, OF WHICH 60 PERCENT GOES TO WEST GERMANY, MAINLY AS BULK WINE.

8. THE MINISTRY OF AGRICULTURE IS HOLDING AN OFFICIAL CONFERENCE ON THE PROBLEM THURSDAY MORNING JULY 25 TO WHICH ALL EMBASSIES CONCERNED ARE INVITED.

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STATE PASS AGRICULTURE ELECTRONICALLY FOR FAS/ITP AND HTP;
ALSO FOR USTR FOR ABELSON AND TERPSTRA

E.O. 12356: N/A
TAGS: EAGR, ETRD, JA
SUBJECT: TESTING OF U.S. WINES BY MHW

AA/ITP-4
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AG OFFICE HAS JUST LEARNED FROM GALLO REPRESENTATIVE (PROTECT) THAT ONE BOTTLE OF EACH VARIETY OF WINE IN EVERY SHIPMENT IS TAKEN BY MINISTRY OF HEALTH AND WELFARE (MHW) FOR SAMPLING EVEN THOUGH WINE HAS ALREADY BEEN TESTED AT GALLO'S LAB WHICH HAS BEEN CERTIFIED BY MHW. TESTING IS INCONVENIENT SINCE IT TAKES 10 TO 12 DAYS, BUT GALLO DOES NOT WISH TO PROTEST TESTING SINCE IT DOES NOT SERIOUSLY INTERFERE WITH TRADE. IF ISSUE IS BROUGHT UP WITH MHW, GALLO'S NAME SHOULD THEREFORE NOT BE USED.

ANDERSON

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US DEPARTMENT OF AGRICULTURE

REFERENCE SLIP

DATE 8/6/85

TO

Bryant Wadsworth

Agricultural Counselor

American Embassy/Tokyo

☐ ACTION

☐ APPROVAL

☒ AS REQUESTED

☐ FOR COMMENT

☐ FOR INFORMATION

☐ INITIALS

☐ NOTE AND FILE

☐ NOTE AND RETURN

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☐ REPLY FOR SIGNATURE O

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REMARKS

Six Pages Follow

Please pass to Emile Yamano &

Associates

FROM

Lisa Twedt

FAS/H&TP (202) 382-8899

USGPO 1985-525-216

FORM AD-514 (8-6

DRAFTED BY: TREASURY/BATF:BOWERMAN
APPROVED BY: TREASURY/BATF:MAXWELL
USDA FAS:SCHROEDER

FROM: USDA FAS WASHDC

TO: AMEMBASSY TOKYO

UNCLAS USDA FAS

E.O.

TAGS

SUBJECT: U.S. TESTING AND CERTIFICATION PROCEDURES THAT WOULD GUARD AGAINST CONTAMINATED WINE BEING EXPORTED FROM THE UNITED STATES

1. BACKGROUND: IN THE SPRING OF 1982, THE JAPANESE GOVERNMENT INDICATED ITS WILLINGNESS TO ACCEPT ANALYTICAL DATA ON U.S. ALCOHOLIC BEVERAGES FROM U.S. LABORATORIES, RECOGNIZED BY THE U.S. GOVERNMENT. IN APRIL 1983, THE FIRST LIST OF U.S. CHEMISTS/LABORATORIES, RECOGNIZED BY THE U.S. GOVERNMENT TO PROVIDE ANALYTICAL DATA TO THE GOVERNMENT OF JAPAN (GOJ) ON U.S. ALCOHOLIC BEVERAGES, WAS FORWARDED TO THE JAPANESE MINISTRY OF HEALTH AND WELFARE (MHW). THE MHW WAS INFORMED THAT THE LIST REPRESENTED CHEMISTS/LABORATORIES THAT MEET THE EXTENSIVE QUALIFICATIONS OF THE BUREAU OF ALCOHOL, TOBACCO AND FIREARMS (ATF) AND USES APPROVED METHODS OF THE ASSOCIATION OF OFFICIAL ANALYTICAL CHEMISTS. ATF REGULARLY REVIEWS THE PRACTICES AND PROCEDURES OF THESE LABORATORIES. IN OCTOBER 1984, THIS LIST OF RECOGNIZED CHEMISTS/LABORATORIES WAS AMENDED AND PRESENTED TO THE GOJ FOR INCLUSION IN THEIR LIST OF LABORATORIES REGISTERED BY MHW. ON DECEMBER 27, 1984, CONFIRMATION WAS RECEIVED FROM THE GOJ THAT THE LIST OF CHEMISTS/LABORATORIES WAS REGISTERED BY MHW.

2. WASHINGTON AGENCIES REQUEST THAT POST INFORM JAPANESE GOVERNMENT OFFICIALS OF MHW'S LIST OF REGISTERED U.S. LABORATORIES AND OF ATF'S TESTING AND CERTIFICATION PROCEDURES FOR WINERIES AND LABORATORIES. THESE PROCEDURES ARE AS FOLLOWS:

LABORATORY CERTIFICATION BY ATF:

- APPLICATION FOR CERTIFICATION THAT A CHEMIST OR LABORATORY IS QUALIFIED TO ANALYZE WINES TO BE EXPORTED MAY BE FILED BY A GRADUATE CHEMIST, BY A LABORATORY UNDERTHE DIRECTION OF A GRADUATE CHEMIST, OR BY AN EXPORTER ON BEHALF OF SUCH A CHEMIST OR LABORATORY. THE APPLICATION IS TO BE FILED WITH THE DIRECTOR, BUREAU OF ALCOHOL, TOBACCO AND FIREARMS. IT WILL BE SUPPORTED BY DOCUMENTATION OF THE GRADUATE CHEMIST'S EDUCATIONAL QUALIFICATIONS AND PROFESSIONAL EXPERIENCE (THIS INFORMATION MAY BE SUBJECT TO VERIFICATION).

- TO QUALIFY FOR CERTIFICATION TO THE DIRECTOR, THE CHEMIST OR LABORATORY MUST:

  - HAVE ACCESS TO SUCH LABORATORY EQUIPMENT AND FACILITIES AS MAY BE NECESSARY TO ANALYZE WINES. THE ADEQUACY OF SUCH EQUIPMENT AND FACILITIES MAY BE SUBJECT TO VERIFICATION OR INSPECTION.

  - SUBMIT TO THE DIRECTOR A REPORT OF THE ANALYSIS OF ANY SAMPLE OF WHITE WINE AND ANY SAMPLE OF RED WINE TOGETHER WITH ONE 750ml SAMPLE OF EACH OF THE WINES ANALYZED.

- IF U.S. GOVERNMENT CHEMISTS VERIFY THE REPORTS OF ANALYSES SUBMITTED BY THE APPLICANT, AND OTHER REQUIREMENTS HAVE BEEN MET, THE DIRECTOR WILL CERTIFY THE LABORATORY OR CHEMIST AND SO NOTIFY THE APPLICANT.

ATF CONTROL OF DOMESTIC WINE INDUSTRY:

- ALTHOUGH ATF PLACES GREAT EMPHASIS ON CONSUMER PROTECTION AND PRODUCT INTEGRITY, IT SHOULD BE NOTED THAT REVENUE PROTECTION IS THE MAIN AREA OF CONCERN IN ATF'S OVERALL SUPERVISORY PROGRAM. LAWS AND REGULATIONS INTENDED TO PROTECT THE REVENUE ALSO HAVE THE EFFECT OF MAINTAINING PRODUCT INTEGRITY. ATF'S SUPERVISION OF THE DOMESTIC WINE INDUSTRY CONSISTS OF THE FOLLOWING PROGRAMS:

THE PERMIT SYSTEM:

  - AS WITH OTHER INDUSTRIES OPERATING UNDER ATF SUPERVISION, THE DOMESTIC WINE INDUSTRY IS REGULATED BY A PERMIT SYSTEM. PERSONS DESIRING TO PRODUCE WINE COMMERCIALLY ARE REQUIRED, UNDER THE FEDERAL ALCOHOL ADMINISTRATION ACT (FAA ACT), TO OBTAIN A BASIC PERMIT FROM ATF. QUALIFICATION REQUIREMENTS FOR SUCH PERMITS ARE VERY STRINGENT, AND ARE AIMED AT PREVENTING UNTRUSTWORTHY INDIVIDUALS OR PERSONS WITH CRIMINAL BACKGROUNDS FROM ENTERING THE INDUSTRY.

  - CONTINUED WINERY OPERATION UNDER A BASIC PERMIT IS CONTINGENT UPON COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS. THE BASIC PERMIT, THEREFORE, IS THE STATUTORY FOUNDATION OF ATF CONTROL. ATF HAS THE AUTHORITY TO DENY, SUSPEND, OR REVOKE BASIC PERMITS, SHOULD THE SITUATION WARRANT SUCH ACTION.

FORMULAS AND STANDARDS OF IDENTITY FOR WINES:

- FORMULAS ARE REQUIRED FOR THE DOMESTIC PRODUCTION OF ALL WINE EXCEPT STANDARD WINES TO WHICH NOTHING HAS BEEN ADDED WHICH WOULD INFLUENCE TASTE OR STRENGTH (EXCEPT MATERIALS USED TO CORRECT OR STABILIZE WINE UNDER NORMAL CELLAR TREATMENT) AND SUCH MATERIAL MUST HAVE BEEN APPROVED BY THE FOOD AND DRUG ADMINISTRATION (FDA) FOR USE IN FOODS. STANDARD WINES MUST BE IN ACCORDANCE WITH THE STANDARDS OF IDENTITY SET FORTH IN PART FOUR OF THE FAA ACT REGULATIONS. THESE REGULATIONS INCLUDE STANDARDS FOR GRAPE TYPE DESIGNATIONS, GENERIC, SEMI-GENERIC, AND NON-GENERIC DESIGNATIONS, AND APPELLATIONS OF ORIGIN.

- FORMULAS ARE EXAMINED AS TO INGREDIENTS USED AND PRODUCTION PROCESSES EMPLOYED. IN ADDITION, SAMPLES OF THE PROPOSED PRODUCT ARE ANALYZED FOR CERTAIN FORMULA WINES. WHERE ESSENCES OR FLAVORING EXTRACTS ARE USED, THEY MUST HAVE RECEIVED PRIOR APPROVAL FROM THE ATF LABORATORY. ESSENCES AND FLAVORING MATERIALS MAY CONTAIN ONLY MATERIALS APPROVED BY FDA FOR USE IN FOODS.

- FORMULAS ARE REQUIRED AND RECORDS ARE MAINTAINED FOR THE FOLLOWING WINE CATEGORIES:

    APERITIF WINES
    BLENDING WINES
    COOKING WINES
    FLOR SHERRY
    WINES SUCH AS AGRICULTURAL WINES, AND WINES MADE WITH DRIED FRUITS
    KOSHER WINES
    RETSINA WINES
    SPANISH TYPE BLENDING SHERRY
    SPARKLING WINES
    SPECIAL NATURAL WINES
    VERMOUTH

LABELS:

- NO WINE CAN BE INTRODUCED INTO INTERSTATE OR FOREIGN COMMERCE UNLESS IT BEARS A LABEL APPROVED BY ATF IN ACCORDANCE WITH THE FAA ACT.

- CERTAIN MANDATORY INFORMATION MUST BE INCLUDED ON SUCH LABELS, INCLUDING THE BRAND NAME; THE CLASS, TYPE, OR OTHER DESIGNATION; THE NAME AND ADDRESS OF THE BOTTLER OR PACKER; THE ALCOHOLIC CONTENT; AND THE NET CONTENT. LABELS MAY NOT, HOWEVER, CONTAIN ANY

FALSE OR MISLEADING STATEMENTS; ANY STATEMENT DISPARAGING OF A COMPETITOR'S PRODUCT; ANY OBSCENE OR INDECENT STATEMENT; ANY FALSE OR MISLEADING GUARANTY OR STATEMENT RELATING TO TEST OR ANALYSIS, WHETHER FALSE OR NOT, WHICH ATF FINDS LIKELY TO BE MISLEADING; OR OTHERS AS LISTED IN THE FAA ACT REGULATIONS.

RECORDS AND REPORTS:

- THE PROPRIETOR OF A WINERY IS REQUIRED TO MAINTAIN PRECISE RECORDS OF EVERY ASPECT OF WINERY ACTIVITY, FROM RECEIPT OF ALL RAW MATERIALS THROUGH REMOVAL OF THE FINISHED PRODUCT. RECORDS ARE USED AS SOURCE MATERIAL FOR THE PREPARATION OF REPORTS AND TAX RETURNS WHICH THE PROPRIETOR IS REQUIRED TO FILE WITH ATF AT PRESCRIBED INTERVALS; ALSO, FOR USE BY ATF INSPECTORS MAKING PERIODIC AUDITS. THE PROPRIETOR GENERALLY MAINTAINS HIS OWN RECORDS IN ADDITION TO THOSE REQUIRED BY ATF; THESE ALSO ARE UTILIZED BY ATF INSPECTORS IN ASSURING THE INTEGRITY OF THE PRODUCT.

- FOR CONTROL OF PRODUCT INTEGRITY, THE PROPRIETOR'S RECORDS OF ALL MATERIALS RECEIVED FOR USE IN PRODUCTION IS OF GREAT IMPORTANCE. ATF REQUIRES A PROPRIETOR TO MAINTAIN A SEPARATE RECORD SHOWING THE RECEIPT AND DISPOSITION OF WINEMAKING MATERIALS SUCH AS FRUIT, JUICE, OR CONCENTRATED JUICE. THE RECORD MUST SHOW THE DATE OF RECEIPT, QUANTITY RECEOVED, THE NAME AND ADDRESS OF THE PERSON FROM WHOM RECEIVED, AND THE DATE OF USE OR DISPOSITION OF THE MATERIALS. WHERE THE MATERIALS ARE RECEIVED FROM OTHERS, INVOICES OR COMMERCIAL PAPERS MUST BE MAINTAINED IN CHRONOLOGICAL ORDER IN SUPPORT OF THE RECORD. WHERE A PROPRIETOR WISHES TO ACCOUNT FOR WINE UNDER VARIETAL OR VINTAGE DESIGNATIONS, COMPLETE TANK RECORDS MUST BE MAINTAINED SO THAT THE ORIGIN OF THE WINE CAN BE VERIFIED.

- RECORDS MUST ALSO BE MAINTAINED TO COVER USE, OR OTHER DISPOSITION OF, SUGAR, ACIDS, OR CHEMICAL PRESERVATIVES. SUCH MATERIALS MAY BE USED ONLY WITHIN SPECIFICALLY PRESCRIBED LIMITATIONS. ALL OF THE WINEMAKER'S RECORDS MUST BE POSTED NO LATER THAN THE NEXT SUCCEEDING BUSINESS DAY AFTER THE OPERATION TOOK PLACE.

INSPECTION PROGRAM:

- ATF INSPECTORS CONDUCT ON-SITE INSPECTIONS AT WINERIES ON A PERIODIC BASIS TO EXAMINE ALL PHASES OF THE WINERY OPERATIONS, INCLUDING:

  - VERIFICATION OF THE PROPRIETOR'S PRESCRIBED RECORDS THROUGH THE TAKING OF INVENTORIES AND COMPARISON OF SUCH INVENTORIES WITH RECORD INVENTORIES.

  - THE EXAMINATION OF ORIGINAL SOURCES OF INFORMATION AND COMPARISON WITH INFORMATION ON PRESCRIBED RECORDS.

  - A DETERMINATION AS TO WHETHER ALL PRODUCTION, BOTTLING AND REMOVALS OF WINE HAVE BEEN IN COMPLIANCE WITH REQUIREMENTS.

  - A DETERMINATION THAT ALL WINES SUBJECT TO TAX WERE RECORDED, THE CORRECT TAX WAS DETERMINED AND THE PROPER RETURNS WERE FILED, BASED ON AN AUDIT OF ALL WINES REMOVED DURING THE CHECK PERIOD.

  - A DETERMINATION THAT BOTTLE FILL AND ALCOHOLIC CONTENT ARE CORRECT AND IN ACCORDANCE WITH REQUIREMENTS.

  - ASSURANCE THAT LABEL DESIGNATION OF WINE IS PROPER AND THAT LABEL WAS APPROVED PRIOR TO USE.

  - VERIFY ADHERENCE TO APPROVED FORMULAS.

  - ASSURANCE THAT THE USE OF AMELIORATING MATERIAL AND THE ADDITION OF SPIRITS TO WINE ARE WITHIN THE STRICT REGULATORY LIMITATIONS. (WINE SPIRITS MUST BE DERIVED FROM THE SAME KIND OF FRUIT AS THE WINE).

- ATF CONTROL IS MAINTAINED THROUGH THE INTERRELATIONSHIP OF THE VARIOUS SAFEGUARDS AND REQUIREMENTS WHICH ENCOMPASS EVERY AREA OF THE WINEMAKER'S ACTIVITY, AND ENSURED BY THE INSPECTION PROGRAM.

- THE BASIC PERMIT IS REQUIRED BEFORE THE WINEMAKER CAN OPERATE, A FORMULA IS REQUIRED FOR ALL WINES OTHER THAN NATURAL STILL WINES, LABELS MUST BE COMPATIBLE WITH FORMULAE. RECORDS AND

REPORTS DOCUMENT THE USE OF MATERIALS IN WINEMAKING, ENSURING PRODUCT INTEGRITY. ALL OF THESE CONTROLS ARE IMPORTANT, BUT ALL ARE DEPENDENT TO SOME EXTENT ON VOLUNTARY COMPLIANCE. THEREFORE, THE SINGLE MOST IMPORTANT FACTOR IN ATF SUPERVISION OF THE WINE INDUSTRY IS THE INSPECTION PROGRAM, WHICH ENSURES AND PROMOTES THE VOLUNTARY COMPLIANCE.

ATF SAMPLING PROGRAM:

- TO ASSURE ADHERENCE TO FORMULAS AND PRODUCTION PROCESSES, AS WELL AS CONSUMER PROTECTION, SAMPLES OF WINE PRODUCTS ARE SECURED FROM THE PRODUCER AND THE RETAIL MARKET AND SENT TO ATF LABORATORIES FOR EXTENSIVE TESTING/ANALYSIS. TESTING FOR HAZARDOUS MATERIAL AND FOREIGN MATTER IN WINES IS AN ONGOING PORTION OF ATF'S INSPECTION PROGRAM.

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APPENDIX 3.—RELEVANT BATF MATERIAL AND DOCUMENTATION

A. BATF'S LEGAL ANALYSES ON ITS STATUTORY AUTHORITY TO REQUIRE TESTING AND REMOVAL OF WINES FOR CONTAMINANTS, AND THE FEDERAL ALCOHOL ADMINISTRATION ACT

UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

GENERAL GOVERNMENT
DIVISION

1-21
3 of 3

JAN 24 1986

John J. Manfreda
Assistant Chief Counsel for Alcohol
and Tobacco
Bureau of Alcohol, Tobacco and Firearms
U.S. Department of Treasury
Room 5241
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20226

Dear Mr. Manfreda:

As you are aware, the General Accounting Office's Resources, Community, and Economic Development Division is performing a congressionally requested review of imported wines contaminated with diethylene glycol (DEG). Since November 1985 GAO has contacted BATF officials to gather information on BATF's actions and testing program in responding to the recent concern. As part of our review, on January 21, 1986, Lillian Wargotz contacted Patricia Milgran in your office regarding BATF's statutory authority in testing, seizing, and removing these contaminated wines from the U.S. market. As requested, we would like you to address the following questions which will help us clarify BATF's statutory authority.

1. Under what statutory authority did BATF initiate the DEG testing program?

2. Why is the presence of diethylene glycol in wine a mislabeling issue, given that wine producers are not required to list all ingredients that are used to produce their wine?

3. Does BATF have the authority to require wholesalers and importers to test their Austrian products for the presence of DEG?

4. Does BATF have the authority to require wholesalers and importers to submit the results of the DEG testing done by private laboratories on their products?

5. Could BATF revoke or suspend basic permits from wholesalers or importers for non-compliance based on BATF's request to submit samples to private laboratories for DEG testing?

6. Does BATF have the authority to seize wines contaminated with DEG from wholesalers, importers or retail store owners? If so, under what conditions?

7. Do the same FAA Act formula approval provisions that domestic wine producers follow apply to foreign wine producers?

8. Do the FAA Act limitations on how wines may be naturally improved (through the use of sugar or natural extracts) apply to foreign wine producers? Are imported wines as well as domestic wines required to specify "artificial" (versus "natural") on their labels if they contain a synthetic chemical?

We appreciate your assistance and look forward to receiving your written comments to these questions. If you have any questions please contact Lilian Wargotz on 382-4559 or Kevin Donohue, Group Director on this project, 382-4330. Please mail to the following address:

Kevin Donohue
U.S. General Accounting Office
Rm. M-1002
Waterside Mall
401 M Street, SW
Washington, D.C. 20460

Sincerely yours,

J Kevin Donohue
for John L. Vialet
Senior Group Director

1-21
1 of 3

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, D.C. 20226

February 20, 1986

CC-35,019 AT:PWM

Mr. John L. Vialet
United States General Accounting Office
401 M Street, S.W.
Washington, D.C. 20460

Attention: Mr. Kevin Donohue, Group Director

Dear Mr. Vialet:

S.C.
T-21
3 of 3

This is in response to your recent letter seeking clarification of ATF's legal authority as it pertains generally to the testing, seizure, and removal from the United States market of imported contaminated wines. You indicate that your inquiry is made in connection with a congressionally requested review of imported Austrian wines contaminated with diethylene glycol (DEG), a synthetic material used in antifreeze.

By way of background, ATF received information in July 1985, that certain Austrian wines were contaminated with DEG. After consultation with Food and Drug Administration (FDA) personnel, ATF was advised that the substance DEG is not authorized for addition to any food or beverage. The FDA further advised that there are no tolerance levels for humans that would allow consumption of DEG.

In response to this advice, and given the fact that the Bureau had been placed on notice regarding the possible contamination of natural Austrian wines with DEG, ATF initiated a testing program to determine whether such products did in fact contain DEG and, as such, were mislabeled. This "DEG testing program" consisted of ATF obtaining samples of Austrian wines for testing by purchasing bottles in the marketplace, by testing samples voluntarily submitted to ATF by importers and wholesalers, and by testing samples of wines prior to their release from Customs custody. In addition, ATF issued a Product

Alert Memorandum to wine importers and wholesalers in July 1985, advising them to withhold Austrian wines from sale pending verification that such wines did not contain DEG.

Your first question makes inquiry concerning the statutory authority under which ATF conducted the DEG testing program. This testing was conducted by ATF pursuant to its authority under section 5(e) of the Federal Alcohol Administration Act (FAA Act or the Act), 27 U.S.C. § 205(e). This section vests in the Bureau of Alcohol, Tobacco and Firearms the authority to promulgate regulations regarding the labeling and advertising of alcoholic beverages, such as wine, as will, in part, provide the United States consumer with adequate information concerning the identity and quality of such products. Section 5(e) also provides, in part, that it shall be unlawful for any person engaged in business, inter alia, as an importer or wholesaler to sell, ship, or deliver for sale or shipment in interstate or foreign commerce, or to receive therein, or to remove from Customs custody for consumption, any alcoholic beverages unless such products are bottled, packaged, and labeled in conformity with Bureau regulations.

Furthermore, in order to prevent the sale or shipment in interstate or foreign commerce of wine or other alcoholic beverages that may be bottled, packaged, or labeled in violation of the Act, section 5(e) provides, in relevant part, that no person shall remove bottles from Customs custody unless he has obtained a certificate of label approval from ATF covering the alcoholic beverage. Customs officers are further authorized under this section to withhold the release of alcoholic beverages from Customs custody unless such certificates of label approval have been obtained. As you may know, the regulations implementing section 5(e) of the FAA Act as it pertains to the labeling and advertising of wines as well as the release of imported wines from Customs custody appear at 27 C.F.R. Part 4.

Pursuant to these regulations, samples of Austrian wines were obtained from importers and wines were held in Customs custody for sampling pursuant to 27 C.F.R. § 4.40 which provides that no imported beverage wine in containers shall be released from Customs custody for consumption unless accompanied by an approved certificate of label appro[illegible] as well as pursuant to section 4.38(h) which expressly vests in the Director the authority to request that a full and accurate statement of the contents of wine containers on which labels are to be or have been affixed be provided to ATF to assure that the wine is properly labeled.

In addition, all of the sample request and testing procedures described above were conducted by ATF pursuant to its broad statutory and regulatory authority under section 5(e), which authority includes general powers of investigation under the FAA Act. Although the Act does not expressly grant any powers of investigation, it is ATF's position that it has implied investigative authority, given the overall view of the FAA Act, with its powers, duties, and responsibilities and the congressional intent to create effective regulation of the liquor industry. You will recall that a legal memorandum discussing the question of ATF's investigatory authority under the FAA Act was submitted to Mr. Richard R. Pierson, Assistant General Counsel, GAO, in May 1975. Copies of that memorandum and the accompanying letter are enclosed herewith for your review. Since the date of that memorandum, there has been no judicial, policy, or congressional decision that alters the position of this agency.

Finally, ATF advised both importers and wholesalers to test their Austrian wine products and submit the results to ATF in order to insure that they were not selling mislabeled wines.

Your second question asks how the presence of the synthetic DEG in the imported Austrian wines gives rise to a mislabeling issue under the FAA Act. Briefly, all wine labels are required under the Act and the implementing regulations to state, among other things, the classification, type or other designation of the wine. 27 C.F.R. §§ 4.32 and 4.34. Pursuant to section 4.21(h)(1)(i), any wine containing synthetic materials is a "Class 8" or "imitation" wine and must contain the word "imitation" as part of its designation to be properly labeled. In this instance, the wines in question were designated as a natural grape wine (Class 1) pursuant to section 4.21(a)(1), rather than as an imitation wine.

Questions 3, 4 and 5 inquire as to whether ATF has the authority to require importers and wholesalers to test their Austrian wine inventory for the presence of DEG and submit the results to ATF, and whether any failure to do so could result in suspension or revocation of the permittees' basic permit.

With respect to those importers who have obtained a certificate of label approval from ATF, the Bureau may require that tests be performed by those importers with results submitted to ATF to assure that the product is not mislabeled. In this regard, and as previously noted, 27 C.F.R. § 4.38(h) states as follows:

> Upon request of the Director, there shall be submitted a full and accurate statement of the contents of the containers to which labels are to be or have been affixed.

Willful failure to provide any information requested by ATF pursuant to section 4.38(h) could result in suspension or revocation of the importer's basic permit pursuant to section 4 of the FAA Act, 27 U.S.C. § 204, for failure to comply with the regulations promulgated under section 5 of the Act. Section 4(e) expressly provides that a basic permit is conditioned upon compliance with, *inter alia*, the labeling provisions of the Act.

Furthermore, any importer or wholesaler who is found to have sold or received in interstate or foreign commerce mislabeled Austrian wines contaminated with DEG without testing the product after notification of the problem, could be deemed in willful violation of section 5 of the FAA Act on the theory that the importer or wholesaler knew or should have known that the wine was mislabeled. Such activities could thus result in revocation or suspension of the importer or wholesaler's basic permit.

Finally, ATF has authority under section 2 of the Act, 27 U.S.C. § 202(d), to require "such reports as are necessary to carry out [its] powers and duties" under the Act. Although this authority was not invoked in our previous requests for testing by importers and wholesalers, this section would allow ATF to require the submissions of test results.

In response to your sixth question, ATF has authority under the Internal Revenue Code of 1954 to seize and forfeit mislabeled imported wines. Specifically, 26 U.S.C. § 7302 provides, in pertinent part, as follows:

> It shall be unlawful to have or possess any property intended for use in violating the provisions of the internal revenue laws, or regulations prescribed under such laws, or which has been so used, and no property rights shall exist in any such property . . . .

The regulations pertaining to the importation of alcoholic beverages are contained in 27 C.F.R. Part 251. These regulations have been promulgated by the Director pursuant to his authority under 26 U.S.C. § 7805.

As a condition to importation under Part 251, all foreign wines containing not less than 7 percent and not more than 24 percent of alcohol by volume are required to be packaged, marked, branded, and labeled in conformity with the FAA Act. Accordingly, imported wines found to be labeled in violation of the FAA Act are likewise in violation of the internal revenue laws and are subject to seizure. The manner in which seizure may be effected is specified in section 7302. To date, ATF has not seized any wines alleged to be contaminated with DEG. We would also point out that ATF has authority under 26 U.S.C. § 5311 to detain any container containing or supposed to contain wine when the container is removed in violation of law.

With respect to questions 7 and 8, the precise nature of these questions is not clear to us. To the extent that they appear to inquire as to whether the FAA Act applies to foreign wine producers, the answer is no since the Act has no extraterritorial jurisdiction. Nevertheless, as indicated above, it is unlawful for importers or wholesalers to sell or receive in interstate or foreign commerce foreign wines that are not labeled in conformity with the FAA Act and the implementing regulations. 27 U.S.C. § 205(e); 27 C.F.R. § 251.59. Accordingly, if a label designates the wine as a natural grape wine, then, the contents of the container must conform to the standard of identity for such wine as stated in section 4.21(a)(1) (including the limitations on cellar treatment and how the wine may be naturally improved), or be in violation of the Act.

As a final point, there appears to be some confusion in question number 7 which makes an inquiry concerning formulas. Initially, we would advise that there is no requirement for the submission of wine formulas by any person under the FAA Act regulations. Furthermore, to the extent that the Internal Revenue Code of 1954 may require that formulas be submitted to ATF by domestic producers with respect to certain wine products (see 27 C.F.R. Part 240), these same requirements do not apply to foreign producers since internal revenue laws generally do not have extraterritorial jurisdiction. However, ATF may, in connection with the label approval process, request that information be given with respect to foreign wines such as will allow the Bureau to determine that the wine is properly classified.

We trust that the above satisfactorily responds to your inquiry.

Sincerely yours,

William T. Drake
Deputy Director

Enclosures

CLOSED

MAY [illegible] 1975

CC-2C,401 L:BAB

Mr. Richard R. Pierson
Assistant General Counsel
United States General Accounting Office
Washington, D.C. 20548

Dear Mr. Pierson:

This is in response to your letter of April 16, 1975, regarding the legal basis for an investigative procedure employed by ATF to gather evidence of violations of the Federal Alcohol Administration Act, 27 U.S.C. §§ 201-211. Specifically, you advise that you were unable to determine ATF's legal authority, prior to the initiation of a permit hearing under the Act, to enter the premises of liquor wholesalers and retailers and inspect records for the purpose of uncovering FAA Act violations.

Your letter discusses the decision in Serr v. Sullivan, 270 F.Supp. 544 (E.D. Pa. 1967), aff'd 390 F.2d 619 (3rd Cir. 1968), in which it was held that in spite of the express incorporation of the investigatory subpoena power of the Federal Trade Commission Act, ATF has no power to issue subpoenas to aid investigations of violations of the Act. This conclusion was based upon the finding that the Act contains no authority to conduct investigations. Your letter also cites 26 U.S.C. § 5145(b) which authorizes ATF, as the delegate of the Secretary, to enter the premises of wholesalers and retailers of liquor and inspect records maintained by them for special occupational tax purposes. We would concur with your interpretation that this section, or other provisions of the I.R.C., would not authorize ATF to enter and inspect records for the sole purpose of discovering FAA Act violations. Therefore, from this legal standpoint, it would appear that ATF has no investigative tools with which to enforce the Act. However, this conclusion must be viewed in the context of ATF's role in regulating the same persons under two separate laws.

Whenever ATF personnel inspect the records of a wholesaler or retailer, they do so with dual responsibilities and cannot ignore evidence of FAA Act violations while inspecting records under the I.R.C. authority. Therefore, while it is not our position that I.R.C. power can be used solely for the purpose of an FAA Act investigation, a determination that certain activities concern solely the FAA Act, and that other activities pertain only to the I.R.C. is not always easy to make.

While we agree with your interpretation of Serr v. Sullivan, supra, we do not accept that decision as being a correct interpretation of the Act. ATF was part of the Internal Revenue Service when the Serr case was decided, and enforcement of the Act had relatively low priority within our limited resources. However, since the establishment of ATF as a separate Bureau within the Treasury Department, a greater emphasis has been placed on the enforcement of the Act.

As our effort to more effectively enforce the Act has increased, we have become acutely aware of the serious impediments created by the Serr decision. We have undertaken a reevaluation of the initial acquiescence to the Serr decision. After careful consideration of this decision, we are of the opinion that the decision in Serr is incorrect. We have, therefore, decided that we will consider this decision as binding only in the Third Circuit. Accordingly, we are preparing to amend the ATF Manual to reflect what we believe to be a proper interpretation of the FAA Act investigative authority.

Enclosed is a Memorandum of Law which examines ATF's investigative power under the Act. In addition to exploring the strengths and weaknesses of the Serr opinion, the memorandum considers other relevant legal arguments in concluding that in the event of further litigation the chances of obtaining a favorable decision on this [illegible] good.

- 3 -

Mr. Richard R. Pierson

In conclusion, we would agree that the interpretation of the Act given in the Serr decision would leave ATF on uncertain grounds in terms of the conduct of FAA Act investigations. We hope that this explanation of our view of the Serr decision will clarify the basis for ATF investigative procedures under the Act.

Sincerely yours,

for Rex D. Davis
Director

Enclosure

ABuckles:rdo

CCL

NAME

WRT for

DATE

CORRESPONDENCE APPROVAL AND CLEARANCE

MEMORANDUM OF LAW

Investigatory Subpoena Power Under the FAA Act

In studying the investigatory subpoena power of the Director under the Federal Alcohol Administration Act (hereafter referred to as the FAA Act) it is first necessary to recognize that there is no express investigatory power granted in the FAA Act. However, to aid in the performance of the responsibilities created under the Act, in 27 U.S.C. § 202(c), Congress provided that the provisions of section 9 of the Federal Trade Commission Act be applicable to the "jurisdiction, powers, and duties" of the Secretary. Section 9 of the Federal Trade Commission Act (15 U.S.C. § 49) provides in part:

> "For the purposes of sections 41-46 and 47-58 of this title the Commission or its duly authorized agent or agents, shall at all reasonable times have access to, for the purposes of examination, and the right to copy any documentary evidence of any corporation being investigated or proceeded against; and the Commission shall have power to require by subpoena the attendance and testimony of witnesses and the production of all such documentary evidence to any matter under investigation.. . ."

In so much as this section clearly authorizes the use of subpoenas to "any matter under investigation," the key question shifts then to what are the powers of investigation under the Federal Alcohol Administration Act.

Until 1968 the FAA Act had been interpreted to permit investigations into possible violations of the act, and consequently, the section 9 subpoena powers were used to aid such investigations. But, the lack of express authority to investigate led to a challenge of subpoenas issued in the course of a violation investigation. The subpoenas were held invalid because the investigation in which they were issued was not authorized by the FAA Act. Sorr v. Sullivan, et al. 270 F. Supp. 544 (E.D. Pa. 1967); aff'd, 390 F. 2d 619 (3rd Cir. 1968). Simply put, the argument was that in order for an investigatory subpoena issued pursuant to 15 U.S.C. § 49 to be valid there must first be authority to conduct such investigation. The FAA Act, it was argued, gave no such authority. The Federal District Court adopted the position that no authority expressly or impliedly was intended and refused to enforce the subpoenas. The Third Circuit Court of Appeals affirmed the district court decision in a brief Per Curiam opinion, incorporating by reference the reasons cited by the lower court, and complimenting the district court judge on his opinion. The opinion of the district court is well written and on the surface is persuasive, however, close inspection reveals several weaknesses.

The district court opinion begins by asserting that references to investigation made in section 9 of the Federal Trade Commission Act, refer only to investigations authorized under that Act and can not be used to infer investigative power in the Federal Alcohol Administration Act. The opinion then procedes to set out three grounds on which it bases its conclusion that no such power to investigate was intended by Congress.

> 1. Four other legislative enactments which incorporate section 9 of the Federal Trade Commission Act contain express investigative authority.
>
> 2. Legislative history of the Act shows that Congress dropped an amendment which would have provided for investigations.
>
> 3. The power under the Act to conduct permit proceedings can be used to effectuate the enforcement of its provisions.

The court calls attention to sections of four other acts of Congress which incorporate section 9 of the Federal Trade Commission Act, to illustrate that in these acts Congress expressly grants power to conduct investigations. Packers and Stockyards Act, 7 U.S.C. §§ 210, 222; Agricultural Adjustment Act, 7 U.S.C. §§ 608(1), 610(h); The Fair Labor Standards Act, 29 U.S.C. §§ 209, 211; and The Labor-Management Reporting and Disclosure Act, 29

U.S.C. § 521. The obvious implication being that had Congress intended such power here they likewise would have expressly granted it. Implicit, however, in this analogy is that the legislation cited is comparable in all relevant aspects to the Federal Alcohol Administration Act. While this is perhaps the strongest element of the court's opinion, there are certain features which make it possible to distinguish the legislation cited from the Federal Alcohol Administration Act.

One shortcoming of the district court opinion in this respect is that it fails to acknowledge that in terms of administrative law, "investigative power" encompasses a broad area of possible authority. Administrative investigations can involve everything from detective work like that of the FBI to wide open investigative studies of an entire industry designed to aid in developing additional legislation. Davis, Administrative Law Treatise, section 3.02, (1958). While it is conceded that the acts listed by the court do contain direct references to authority to investigate, it is necessary to note the types of investigative power involved, and the circumstances under which they are granted.

An examination of these Acts in this light reveals that the power to conduct investigations into possible violations is granted either in conjunction with the broader power to call for general fact finding investigations, or supplemental to a third party complaint system of enforcement, or both. Under the FAA Act, since no listing of broad powers of investigation was undertaken, it was not necessary to specifically authorize limited scope investigations which would necessarily be implied. Also, the FAA Act does not rely on a third party complaint system to bring violations to the attention of the Director. Where under a complaint system there may be a need for express authorization for violation investigations initiated outside the complaint procedure, the same is not true where, as under the FAA Act, the Director alone is made responsible for detecting violations of the Act.

When the district court in Serr refused to enforce the Director's investigatory subpoena, the second supportive argument relied on the legislative history of the FAA Act. The court observed:

> "The legislative history of the Act supports the conclusion that no power of investigation was intended. The bill was amended in the Senate to include an investigatory power. 79 Cong. Rec. 12924 (1935). The bill, as amended, went to the conference committee which rejected the amendment and reported that: 'The House bill had no similar (investigative power) provision. The Senate recedes.' H.R. Rep. No. 1898, 74th Congress, 1st Session 9 (1935). Consequently, it appears that Congress never intended to grant such an investigatory power to the Director." Serr v. Sullivan, supra, at p. 546.

Again, the district court opinion is pursuasive on its face, but the infirmity is that the court still relies on a broad use of the term "investigative power." The amendment from which the Senate receded provided as follows:

> "The Commission is authorized to make investigations and studies and to report thereon from time to time to the President and to the Congress, together with recommendations, with respect to matters necessary for the proper performance of the powers and duties conferred upon the Commission, and with respect to the production, distribution, and consumption of alcoholic beverages, including monopolistic practices, unfair methods or competition, and concentration of ownership in the alcoholic beverages industries, and control of retail outlets and prices; advertising, labeling, and merchandising methods with respect to alcoholic beverages, including standards of identity, quality, and size and fill or container thereof; and enforcement of the twenty-first amendment, State and Federal cooperation in the administration of alcoholic control laws, and methods of promoting temperance. The Commission whenever in its judgement such action will be in the public interest may publish the results of such investigations and studies." Cong. Rec. Vol. 79, No. 167 p. 13396.

The amendment, it can be argued, referred only to general trade practice investigations to be conducted to develop information which would be useful in drafting additional legislation. The fact that reports of such investigations and studies were to be submitted to the President and Congress and that the Commission could publish the results is not consistent with an interpretation that this amendment referred to the routine investigations of specific violations of the Act. The interpretation of the district court is also difficult to accept because it necessitates the conclusion that Congress intended the Act to be ineffective.

The district court in Serr attempted to get around this unacceptable conclusion by finding that the FAA Act can be made effective through the use of permit proceedings. The court stated that the Director --

> ". . . may hold hearings to determine whether a permit should issue or be revoked and may use the subpoena power at this time. The distinction lies in the nature of the proceedings. The permittee may attend and take part in a formal hearing, but would be unable to participate or even be present during an investigative proceeding, taking the testimony of various witnesses. We believe that Congress intended such a result and clearly demonstrated this intention in the Act." Serr, supra, at p. 546

This conclusion is erroneous for two reasons. First, it presupposes that all persons subject to the FAA Act are permittees. The most notable exception to this proposition is brewers who are not required under section 3 of the FAA Act (27 U.S.C. § 203) to obtain a permit. Permit proceedings would also be ineffective in dealing with interlocking directorates as prohibited by section 8 of the Act (27 U.S.C. § 208). The court's opinion in addition fails to envision problems that would arise where a person was conducting business without the required basic permit.

[illegible] second failing in [illegible] logic is that if the only difference [illegible] an investigation and a [illegible] proceeding is being the ability of the permittee [illegible] present and take part in the proceedings. The Administrative Procedure Act, section 558 of Title 5 U.S.C. provides:

* * * * *

"(c) . . . Except in cases of willfulness or those in which public health, interest, or safety require otherwise, the withdrawal, suspension, revocation, or annulment of a license is lawful only if, before the institution of agency proceedings, therefore, the licensee has been given—

"(1) notice by the agency in writing of the facts or conduct which may warrant the action; and

"(2) Opportunity to demonstrate or achieve compliance with all lawful requirements."

Section 554 provides:

* * * * *

"(b) Persons entitled to notice of an agency hearing shall be timely informed of—

"(1) the time, place, and nature of the hearing;

"(2) the legal authority and jurisdiction under which the hearing is to be held; and

"(3) the matters of fact and law asserted."

It follows that there would be no way for the Director to give the required notice of the facts and conduct which would warrant action, or of the legal authority and jurisdiction under which a hearing was to be held, or the matters of fact and law asserted, if he were unable to investigate the truth or falsity of allegations upon which the charges are based. Far from being merely a substitute method of enforcement as suggested by the district court, the effective use of permit proceedings is dependent upon, and not in alternative to, investigations. Investigations are likewise prerequisite to any use of the Director's authority under section 7 of the FAA Act (27 U.S.C. § 207) to compromise, in certain cases, liability arising with respect to any violation of the Act.

Thus far the primary thrust of this memorandum has been to refute the argument of the district court in the _Serr_ decision, and it has been a negative approach to that extent. The next step will be to take a more positive stance by examining the possible arguments which support the implied power to investigate under the FAA Act.

First, the legislative history of the Act discloses that Congress intended the FAA Act to be strong and effective legislation to deal with what was viewed as a formitable problem:

> "The proposed legislation by providing a Federal agency to supervise the aspects of the liquor industry within the range of Federal power, a permit system under which that supervision can be effective, and methods to restrict unlawful and unfair practices in the liquor business, will, it is believed, do much to protect the revenue and to prevent the recurrence of those evils known to be present in the liquor traffic in the past and which no fair minded citizen wishes to be restored and maintained." _H.R. Rep. No. 1542_, 74th Cong. 1st Sess.

This passage illustrates that Congress intended to create both a system of supervision, and a law enforcement arm to restrict unlawful and unfair practices. Section 5 of the FAA Act lists the business practices which Congress is intent on controlling. The House Report on the FAA Act reveals the following comment on section 5:

> [illegible]. . . The most effective means of preventing monopolies and restraints of trade in this industry is by prohibiting such practices, thereby striking at the causes for restraints of trade and monopolistic conditions and dealing with such conditions in their incipiency. . . ." H.R. Rep. No. 1542, 74th Cong. 1st Sess."

Prohibiting these practices as envisioned by the Congress obviously involves more than just making them unlawful. This statement illustrates that Congress intended vigilance on the part of the Director to strike at such conditions "in their incipiency", and only through the power to make investigations is such effectiveness possible. Congress must have been fully aware of the fact that the investigative power was essential to the law enforcement and supervisory power. As an eminent commentator on administrative law has observed:

> "The administrative power to investigation is, of course, essential to law enforcement, but its most significant functions probably relate to the exercise of other administrative powers. The power to investigation is in one major aspect part and parcel of the prosecuting power and of the practically more important power of supervision which grows out of the prosecuting power." 1 Davis, Administrative Law Treatise, section 3.02 p. 164, (1958).

In construing an act bestowing power, duties, and responsibilities upon an administrative agency the prime object in construction is to ascertain and carryout the intent of the legislature. See Addision v. Holly Hill Fruit Products 322 U.S. 607, (1943), and Texas and Pacific Railway Co. v. I.C.C. 162 U.S. 197, (1896). The Supreme Court has demonstrated in the past that it will favor construction which will enable an agency to perform its duties and enable it to be an effective instrument for law enforcement. See I.C.C. v. Goodrich Transit Co. 224 U.S. 194, (1912) and Fleming v. Mohawk 331 U.S. 11, (1946).

Remedial legislation has always been interpreted liberally in order to attain the end intended by Congress. F.T.C. v. Mandel Bros. 359 U.S. 385, (1958). And, in determining whether an agency under remedial statutes, has certain powers, it has been held that authority should be liberally construed in light of the purpose of the legislation. Falsone v. United States 205 F. 2d 734 (5th Cir. 1953) cert. denied, 346 U.S. 864, (1953). In Stahlman v. F.C.C. 126 F. 2d 124 (D.C. Cir. 1942) the court held:

> "The Commission's right to grant public licences or to revoke licences in the public interest, and likewise to make rules and regulations necessary to the carrying out of the provisions of the Act, implies the grant of all the means necessary or appropriate to the discharge of the powers expressly granted." at p. 128

In the only Supreme Court decision dealing with construction of the FAA Act, Black v. Magnolia Liquor Co. 355 U.S. 24, (1957)6 the Court observed:

> ". . . we deal here with remedial legislation whose language should be given hospitable scope. The will of Congress would be thwarted if we gave the language in question the strictest construction possible. The fair meaning of the Act is our guide.. . ." p. 26

For these reasons, the way would seem open for a court to find that the power to investigate for violations is implied in the FAA Act as a means necessary and appropriate for the effective performance of the Director's duties, powers, and responsibilities under the Act.

In Graylyn Bainbride Corporation v. Wood, 173 F. 2d 790 (8th Cir. 1949) cert. denied, 337 U.S. 958, (1949), just such a position was taken with respect to the power of the Expediter to make inspections under the Rent Control Act of 1947. In that decision the court quoting from Woods v. Carol Management Corp., 168 F. 2d 791 (2nd Cir. 1948), reasoned:

> "Though the 1947 Act decreased somewhat the scope of the authority of the Expediter, it still imposed upon him the duty of limiting

> the rents to existing ceilings, subject to a power of adjustment in the interest of justice. It did not in terms provide for inspection and it omitted the power to issue subpoenas given under the 1942 Act. We, however, believe it to be clear that the duties imposed by the Act . . . justify the right to inspect leased premises in order to detect violations." at p. 792

In summary, it would seem that there are strong arguments to support the power of the Director to conduct investigations into possible violations. If this authority can be established it would seem apparent that section 2(g) of the FAA Act (27 U.S.C. § 202(c)) would permit the use of subpoenas to aid in such investigations. However, the strength of the opposing view cannot be negated. The district court in *Serr v. Sullivan*, *supra*, found persuasive the fact that four other Congressional enactments had express investigative authority. This is perhaps the strongest element of the opinion, in that there is the implication, that Congress intended to exclude investigative powers from the FAA Act. This implication would be bolstered by the fact that virtually every other major enactment creating a regulatory agency authorizes investigations. As observed by Kenneth Culp Davis, a recognized authority in the field of administrative law:

> "A good deal of significance should be attached to the reiteration of congressional will in all these statutes. Not a single important regulatory statute fails to provide broad powers of investigation supported by powers to compel production of evidence." 1 Davis, *Administrative Law Treatise*, section 3.03 (1958).

While this fact is formidable, as pointed out earlier in this memorandum, a distinguishing feature is that these all involve broad investigative powers not claimed by the Director under the FAA Act. There appears to be ample legal authority for a decision either way on this matter. An overall view of the FAA Act, however, with its powers, duties, and responsibilities, and the Congressional intent to create effective regulation would tend to make chances good that a favorable decision, implying investigative power, could be obtained in the event of further litigation of this matter.

UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

OFFICE OF GENERAL COUNSEL

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APR 18 1975

Mr. Rex D. Davis, Director
Bureau of Alcohol, Tobacco and Firearms
Department of the Treasury

20401

Dear Mr. Davis:

As you are aware, the Joint Committee on Internal Revenue Taxation has requested the General Accounting Office to review the administration of various revenue-related activities by the Department of the Treasury. During our review, we have encountered difficulty in determining the precise legal basis for an investigative procedure employed by the Bureau of Alcohol, Tobacco and Firearms (ATF) to gather evidence of violations of the Federal Alcohol Administration (FAA) Act, 27 U.S.C. 201 *et seq.* Specifically, we have been unable to determine ATF's legal authority, prior to the initiation of a permit hearing under the FAA Act, to enter the premises of liquor wholesalers and retailers and inspect records for the purpose of uncovering FAA Act violations.

Our preliminary analysis indicates that investigations to discover violations of the FAA Act are authorized under that act only in connection with a permit hearing. In *Serr* v. *Sullivan*, 270 F. Supp. 544 (E.D. Pa. 1967), aff'd, 390 F.2d 619 (3d Cir. 1968), after comparing other similar laws and reviewing the legislative history of the act, a Federal court appears to have concluded that the FAA Act contains no investigative authority except when exercised incident to a permit hearing. It would seem, therefore, that the FAA Act does not authorize the inspection of liquor wholesaler or retailer records for FAA Act violations, or the seizure of evidence during such an inspection, prior to the initiation of a permit hearing.

Section 5146(b) of the Internal Revenue Code of 1954 is another potential source of authority to gather evidence of FAA Act violations from liquor wholesalers and retailers. Under this provision, the Secretary or his delegate is authorized to enter the premises of liquor wholesalers and retailers and inspect records maintained by them relating to special occupational taxes. However, the language of the provision does not seem to authorize the Secretary or his delegate to enter the premises and inspect the records of liquor wholesalers and retailers for the purpose of discovering FAA Act violations.

Based on the interpretation of the FAA Act in Barr v. Sullivan and the limited purpose for which inspections under §5146(b), I.R.C. (1954), may be undertaken, we have reservations about the ability of ATF to administer and enforce the act effectively without exceeding existing legal limitations. To investigate potential violations of the FAA Act by means of entering the premises and inspecting the records of liquor wholesalers and retailers, it seems that ATF either must initiate a permit hearing, an administratively burdensome procedure, or must rely on the mere inadvertent discovery of evidence, uncovered during an inspection of tax-related records under §5146(b), I.R.C. (1954). Moreover, we are concerned that if there are legal limitations on ATF's investigative authority, as the above discussion indicates there may be, such limitation may be honored as much in the breach as in their observance. From discussions with ATF employees, observations of actual inspections, and a review of ATF manuals, we have found some evidence indicating that, prior to the initiation of a permit hearing, the premises of liquor wholesalers and retailers are being entered and their records are being inspected for the primary purpose of discovering FAA Act violations.

Because of the importance of these issues, we request that you provide us with an administrative report setting out ATF's legal authority to inspect records and gather evidence of violations of the FAA Act at the premises of liquor wholesalers and retailers. We would like to know particularly whether you agree with the interpretations of the FAA Act and §5146(b), I.R.C. (1954), suggested here, and whether there are additional provisions in the U.S. Code that authorize this particular inspection procedure.

Due to the congressional interest in this matter, we would appreciate a prompt reply. If you have any questions, please contact either Mr. James Carlan of our audit staff or Mr. J. Michael Burns (129-3575) of our General Counsel's office.

Sincerely yours,

Richard R. Pierson

Richard R. Pierson
Assistant General Counsel

CHAPTER 8—FEDERAL ALCOHOL ADMINISTRATION ACT

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CHAPTER REFERRED TO IN OTHER SECTIONS

This chapter is referred to in title 15 section 1459; title 19 section 1754; title 26 section 5171.

§ 201. Short title

This chapter may be cited as the "Federal Alcohol Administration Act".

(Aug. 29, 1935, ch. 814, § 1, 49 Stat. 977.)

TRANSFER OF FUNCTIONS

Federal Alcohol Administration and offices of members and Administrator thereof were abolished and their functions directed to be administered under direction and supervision of Secretary of Treasury through Bureau of Internal Revenue [now Internal Revenue Service] in Department of Treasury, by Reorg. Plan No. III of 1940, § 2, eff. June 30, 1940, 5 F.R. 2107, 54 Stat. 1232, set out in the Appendix to Title 5, Government Organization and Employees. See also, sections 8 and 9 of said plan for provisions relating to transfer of records, property, personnel, and funds. Section 2 of Reorg. Plan No. III of 1940 was repealed as executed by Pub. L. 97-258, § 5(b), Sept. 13, 1982, 96 Stat. 1068, 1085, the first section of which enacted Title 31, Money and Finance. Department of the Treasury Order 221 of July 1, 1972, established the Bureau of Alcohol, Tobacco and Firearms and transferred to it the alcohol and functions of the Internal Revenue Service.

§ 202. General provisions

(a) Expenditures

Appropriations to carry out powers and duties of the Secretary of the Treasury under this chapter shall be available for expenditure, among other purposes, for personal services and rent in the District of Columbia and elsewhere, expenses for travel and subsistence, for law books, books of reference, magazines, periodicals, and newspapers, for contract stenographic reporting services, for subscriptions for library services, for purchase of samples for analysis or use as evidence, and for holding conferences of State and Federal liquor control officials.

(b) Utilization of other governmental agencies

The Secretary of the Treasury may, with the consent of the department or agency affected, utilize the services of any department or other agency of the Government to the extent necessary to carry out his powers and duties under this chapter and authorize officers and employees thereof to act as his agents.

(c) Applicability of other laws

The provisions including penalties, of sections 49 and 50 of title 15, shall be applicable to the jurisdiction, powers, and duties of the Secretary of the Treasury under this chapter, and to any person (whether or not a corporation) subject to the provisions of laws administered by the Secretary of the Treasury under this chapter.

(d) Reports to Secretary

The Secretary of the Treasury is authorized to require, in such manner and form as he shall prescribe, such reports as are necessary to carry out his powers and duties under this chapter.

(Aug. 29, 1935, ch. 814, § 3(e)–(i), 49 Stat. 977; 1940 Reorg. Plan No. III, § 2, eff. June 30, 1940, 5 F.R. 2108, 54 Stat. 1232; Aug. 7, 1946, ch. 770, § 1(46), 60 Stat. 870.)

CODIFICATION

As originally enacted this section contained four additional subsections lettered (a) to (d) which provided for the creation of a Federal Alcohol Administration as a division of the Treasury Department. By act June 26, 1936, ch. 830, title V, 49 Stat. 1964, however, those subdivisions were repealed and a new Administration created as an independent agency. The repealing act was to be effective when the new administrators authorized thereby were appointed. While the officers so authorized were never appointed and the repeal therefore never became effective, subsections (a) to (d) have been omitted, and original subsections (e) to (i) renumbered, in view of Reorg. Plan No. III of 1940, set out in the Appendix to Title 5, Government Organization and Employees, which abolished the Administration and transferred its functions to the Secretary of the Treasury to be administered through the Bureau of Internal Revenue [now Internal Revenue Service]. See, also, Transfer of Functions note set out under section 201 of this title.

AMENDMENTS

1946—Subsec. (e). Act Aug. 7, 1946, struck out subsec. (e), which related to reports to Congress by the Secretary of the Treasury with respect to the administration of the functions charged to the Secretary under this chapter.

§§ 202a, 202b. Repealed. Pub. L. 89-554, § 8(a), Sept. 6, 1966, 80 Stat. 649

Section 202a, act June 26, 1936, ch. 830, title V, § 501, 49 Stat. 1964, established the Federal Alcohol Administration, and provided for appointment, duties, and pay of its employees.

Section 202b, act June 26, 1936, ch. 830, title V, § 502, 49 Stat. 1964, provided for appointment, pay, tenure, and powers of members of the Federal Alcohol Administration.

§ 202c. Omitted

CODIFICATION

Section, act June 26, 1936, ch. 830, title V, § 503, 49 Stat. 1965, which provided for repeal of former laws, was to have taken effect when a majority of the members authorized to be appointed took office under section 202b of this title. The members, however, were never appointed.

§ 203. Unlawful businesses without permit; application to State agency

In order effectively to regulate interstate and foreign commerce in distilled spirits, wine, and malt beverages, to enforce the twenty-first amendment, and to protect the revenue and enforce the postal laws with respect to distilled spirits, wine, and malt beverages:

(a) It shall be unlawful, except pursuant to a basic permit issued under this chapter by the Secretary of the Treasury—

(1) to engage in the business of importing into the United States distilled spirits, wine, or malt beverages; or

(2) for any person so engaged to sell, offer or deliver for sale, contract to sell, or ship, in interstate or foreign commerce, directly or indirectly or through an affiliate, distilled spirits, wine, or malt beverages so imported.

(b) It shall be unlawful, except pursuant to a basic permit issued under this chapter by the Secretary of the Treasury—

(1) to engage in the business of distilling distilled spirits, producing wine, rectifying or blending distilled spirits or wine, or bottling, or warehousing and bottling, distilled spirits; or

(2) for any person so engaged to sell, offer or deliver for sale, contract to sell, or ship, in interstate or foreign commerce, directly or indirectly or through an affiliate, distilled spirits or wine so distilled, produced, rectified, blended, or bottled, or warehoused and bottled.

(c) It shall be unlawful, except pursuant to a basic permit issued under this chapter by the Secretary of the Treasury—

(1) to engage in the business of purchasing for resale at wholesale distilled spirits, wine, or malt beverages; or

(2) for any person so engaged to receive or to sell, offer or deliver for sale, contract to sell, or ship, in interstate or foreign commerce, directly or indirectly or through an affiliate, distilled spirits, wine, or malt beverages so purchased.

This subsection shall take effect July 1, 1936.

This section shall not apply to any agency of a State or political subdivision thereof or any officer or employee of any such agency, and no such agency or officer or employee shall be required to obtain a basic permit under this chapter.

(Aug. 29, 1935, ch. 814, § 3, 49 Stat. 978; Feb. 29, 1936, ch. 105, § 1, 49 Stat. 1152; 1940 Reorg. Plan No. III, § 2, eff. June 30, 1940, 5 F.R. 2108, 54 Stat. 1232.)

Codification

In the original, subsections (a) and (b) of this section contained a final paragraph which provided as follows: "This subsection shall take effect sixty days after the date upon which the Administrator first appointed under this act takes office."

Amendments

1936—Subsec. (c). Act Feb. 29, 1936, extended the effective date from "March 1, 1936" to "July 1, 1936".

Transfer of Functions

"Secretary of the Treasury" was substituted in text for "Administrator", meaning the Administrator of the Federal Alcohol Administration, pursuant to Reorg. Plan No. III of 1940, see note set out under section 201 of this title.

Section Referred to in Other Sections

This section is referred to in section 207 of this title; title 26 section 5171.

§ 204. Permits

(a) Who entitled thereto

The following persons shall, on application therefor, be entitled to a basic permit:

(1) Any person who, on May 25, 1935, held a basic permit as distiller, rectifier, wine producer, or importer issued by an agency of the Federal Government.

(2) Any other person unless the Secretary of the Treasury finds (A) that such person (or in case of a corporation, any of its officers, directors, or principal stockholders) has, within five years prior to the date of application, been convicted of a felony under Federal or State law or has, within three years prior to date of application, been convicted of a misdemeanor under any Federal law relating to liquor, including the taxation thereof; or (B) that such person is, by reason of his business experience, financial standing, or trade connections, not likely to commence operations within a reasonable period or to maintain such operations in conformity with Federal law; or (C) that the operations proposed to be conducted by such person are in violation of the law of the State in which they are to be conducted.

(b) Refusal of permit; hearing

If upon examination of any application for a basic permit the Secretary of the Treasury has reason to believe that the applicant is not entitled to such permit, he shall notify the applicant thereof and, upon request by the applicant, afford him due notice and opportunity for hearing on the application. If the Secretary of the Treasury, after affording such notice and opportunity for hearing, finds that the applicant is not entitled to a basic permit hereunder, he shall by order deny the application stating the findings which are the basis for his order.

(c) Form of application

The Secretary of the Treasury shall prescribe the manner and form of all applications for basic permits (including the facts to be set forth therein) and the form of all basic permits, and shall specify in any basic permit the authority conferred by the permit and the conditions thereof in accordance with the provisions of this chapter. To the extent deemed necessary by the Secretary of the Treasury for the efficient administration of this chapter, separate applications and permits shall be required by the Secretary of the Treasury with respect to distilled spirits, wine, and malt beverages, and the various classes thereof, and with respect to the various classes of persons entitled to permits hereunder. The issuance of a basic permit under this chapter shall not operate to deprive the United States of its remedy for any violation of law.

(d) Conditions

A basic permit shall be conditioned upon compliance with the requirements of section 205 of this title (relating to unfair competition and unlawful practices) and of section 206 of this title (relating to bulk sales and bottling), with the twenty-first amendment and laws relating to the enforcement thereof, and with all other Federal laws relating to distilled spirits, wine, and malt beverages, including taxes with respect thereto.

(e) Revocation, suspension, and annulment

A basic permit shall by order of the Secretary of the Treasury, after due notice and opportunity for hearing to the permittee, (1) be revoked, or suspended for such period as the Secretary of the Treasury deems appropriate, if the Secretary finds that the permittee has wilfully violated any of the conditions thereof, provided that for a first violation of the conditions thereof the permit shall be subject to suspension only; or (2) be revoked if the Secretary finds that the permittee has not engaged in the operations authorized by the permit for a period of more than two years; or (3) be annulled if the Secretary finds that the permit was procured through fraud, or misrepresentation, or concealment of material fact. The order shall state the findings which are the basis for the order.

(f) Service of orders

Orders of the Secretary with respect to any denial of application, suspension, revocation, annulment, or other proceedings, shall be served (1) in person by any officer or employee of the Secretary designated by him or any internal revenue or customs officer authorized by the Secretary for the purpose, or (2) by mailing the order by registered mail, addressed to the applicant or respondent at his last known address in the records of the Secretary.

(g) Duration

A basic permit shall continue in effect until suspended, revoked, or annulled as provided herein, or voluntarily surrendered; except that (1) if leased, sold, or otherwise voluntarily transferred, the permit shall be automatically terminated thereupon, and (2) if transferred by operation of law or if actual or legal control of the permittee is acquired, directly or indirectly, whether by stock-ownership or in any other manner, by any person, then such permit shall be automatically terminated at the expiration of thirty days thereafter: *Provided*, That if within such thirty-day period application for a new basic permit is made by the transferee or permittee, respectively, then the outstanding basic permit shall continue in effect until such application is finally acted on by the Secretary of the Treasury.

(h) Appeal; procedure

An appeal may be taken by the permittee or applicant for a permit from any order of the Secretary of the Treasury denying an application for, or suspending, revoking, or annulling, a basic permit. Such appeal shall be taken by filing, in the court of appeals of the United States within any circuit wherein such person resides or has his principal place of business, or in the United States Court of Appeals for the District of Columbia, within sixty days after the entry of such order, a written petition praying that the order of the Secretary be modified or set aside in whole or in part. A copy of such petition shall be forthwith transmitted by the clerk of the court to the Secretary, or any officer designated by him for that purpose, and thereupon the Secretary shall file in the court the record upon which the order complained of was entered, as provided in section 2112 of title 28. Upon the filing of such petition such court shall have exclusive jurisdiction to affirm, modify, or set aside such order, in whole or in part. No objection to the order of the Secretary shall be considered by the court unless such objection shall have been urged before the Secretary or unless there were reasonable grounds for failure so to do. The finding of the Secretary as to the facts, if supported by substantial evidence, shall be conclusive. If any party shall apply to the court for leave to adduce additional evidence, and shall show to the satisfaction of the court that such additional evidence is material and that there were reasonable grounds for failure to adduce such evidence in the proceeding before the Secretary, the court may order such additional evidence to be taken before the Secretary and to be adduced upon the hearing in such manner and upon such terms and conditions as to the court may seem proper. The Secretary may modify his findings as to the facts by reason of the additional evidence so taken, and he shall file with the court such modified or new findings, which, if supported by substantial evidence, shall be conclusive, and his recommendation, if any, for the modification or setting aside of the original order. The judgment and decree of the court affirming, modifying, or setting aside, in whole or in part, any such order of the Secretary shall be final, subject to review by the Supreme Court of the United States upon certiorari or certification as provided in section 1254 of title 28. The commencement of proceedings under this subsection shall, unless specifically ordered by the court to the contrary, operate as a stay of the Secretary's order.

(i) Limitation

No proceeding for the suspension or revocation of a basic permit for violation of any condition thereof relating to compliance with Federal law shall be instituted by the Secretary more than eighteen months after conviction of the violation of Federal law, or, if no conviction has been had, more than three years after the violation occurred; and no basic permit shall be suspended or revoked for a violation of any such condition thereof if the alleged violation of Federal law has been compromised by any officer of the Government authorized to compromise such violation.

(Aug. 29, 1935, ch. 814, § 4, 49 Stat. 978; 1940 Reorg. Plan No. III, § 2, eff. June 30, 1940, 5 F.R. 2108, 54 Stat. 1232; June 25, 1948, ch. 646, § 32(a), 62 Stat. 991; May 24, 1949, ch. 139, § 127, 63 Stat. 107; Aug. 28, 1958, Pub. L. 85-791, § 14, 72 Stat. 946.)

Codification

In subsec. (h) of this section, "section 1254 of title 28" was substituted for "sections 239 and 240 of the Judicial Code, as amended", on authority of act June 25, 1948, ch. 646, 62 Stat. 869, the first section of which enacted Title 28, Judiciary and Judicial Procedure.

Amendments

1958—Subsec. (h). Pub. L. 85-791, in third sentence, substituted "transmitted by the clerk of the court to the Secretary, or" for "served upon, the Secretary, or upon any", substituted "file in the court" for "certify and file in the court a transcript of", and inserted "as provided in section 2112 of title 28", and in fourth sentence, substituted "petition" for "transcript".

Change of Name

"Court of appeals" was substituted for "circuit court of appeals" pursuant to act June 25, 1948, as amended by act May 24, 1949.

Transfer of Functions

"Secretary of the Treasury" and "Secretary" were substituted in subsecs. (a) to (c) and (e) to (i) for "Administrator", meaning the Administrator of the Federal Alcohol Administration, pursuant to Reorg. Plan No. III of 1940, see note set out under section 201 of this title.

Applicability of Administrative Procedure Act

Section 35 of Pub. L. 85-791 provided that: "This Act shall not be construed to repeal or modify any provision of the Administrative Procedure Act (subchapter II of chapter 5, and chapter 7, of Title 5, Government Organization and Employees)."

Section Referred to in Other Sections

This section is referred to in title 26 section 5171.

§ 205. Unfair competition and unlawful practices

It shall be unlawful for any person engaged in business as a distiller, brewer, rectifier, blender, or other producer, or as an importer or wholesaler, of distilled spirits, wine, or malt beverages, or as a bottler, or warehouseman and bottler, of distilled spirits, directly or indirectly or through an affiliate:

(a) Exclusive outlet

To require, by agreement or otherwise, that any retailer engaged in the sale of distilled spirits, wine, or malt beverages, purchase any such products from such person to the exclusion in whole or in part of distilled spirits, wine, or malt beverages sold or offered for sale by other persons in interstate or foreign commerce, if such requirement is made in the course of interstate or foreign commerce, or if such person engages in such practice to such an extent as substantially to restrain or prevent transactions in interstate or foreign commerce in any such products, or if the direct effect of such requirement is to prevent, deter, hinder, or restrict other persons from selling or offering for sale any such products to such retailer in interstate or foreign commerce; or

(b) "Tied house"

To induce through any of the following means, any retailer, engaged in the sale of distilled spirits, wine, or malt beverages, to purchase any such products from such person to the exclusion in whole or in part of distilled spirits, wine, or malt beverages sold or offered for sale by other persons in interstate or foreign commerce, if such inducement is made in the course of interstate or foreign commerce, or if such person engages in the practice of using such means, or any of them, to such an extent as substantially to restrain or prevent transactions in interstate or foreign commerce in any such products, or if the direct effect of such inducement is to prevent, deter, hinder, or restrict other persons from selling or offering for sale any such products to such retailer in interstate or foreign commerce: (1) By acquiring or holding (after the expiration of any existing license) any interest in any license with respect to the premises of the retailer; or (2) by acquiring any interest in real or personal property owned, occupied, or used by the retailer in the conduct of his business; or (3) by furnishing, giving, renting, lending, or selling to the retailer, any equipment, fixtures, signs, supplies, money, services, or other thing of value, subject to such exceptions as the Secretary of the Treasury shall by regulation prescribe, having due regard for public health, the quantity and value of articles involved, established trade customs not contrary to the public interest and the purposes of this subsection; or (4) by paying or crediting the retailer for any advertising, display, or distribution service; or (5) by guaranteeing any loan or the repayment of any financial obligation of the retailer; or (6) by extending to the retailer credit for a period in excess of the credit period usual and customary to the industry for the particular class of transactions, as ascertained by the Secretary of the Treasury and prescribed by regulations by him; or (7) by requiring the retailer to take and dispose of a certain quota of any of such products; or

(c) Commercial bribery

To induce through any of the following means, any trade buyer engaged in the sale of distilled spirits, wine, or malt beverages, to purchase any such products from such person to the exclusion in whole or in part of distilled spirits, wine, or malt beverages sold or offered for sale by other persons in interstate or foreign commerce, if such inducement is made in the course of interstate or foreign commerce, or if such person engages in the practice of using such means, or any of them, to such an extent as substantially to restrain or prevent transactions in interstate or foreign commerce in any such products, or if the direct effect of such inducement is to prevent, deter, hinder, or restrict other persons from selling or offering for sale any such products to such trade buyer in interstate or foreign commerce: (1) By commercial bribery; or (2) by offering or giving any bonus, premium, or compensation to any officer, or employee, or representative of the trade buyer; or

(d) Consignment sales

To sell, offer for sale, or contract to sell to any trade buyer engaged in the sale of distilled spirits, wine, or malt beverages, or for any such trade buyer to purchase, offer to purchase, or contract to purchase, any such products on consignment or under conditional sale or with the privilege of return or on any basis otherwise than a bona fide sale, or where any part of such transaction involves, directly or indirectly, the acquisition by such person from the trade buyer or his agreement to acquire from the trade buyer other distilled spirits, wine, or malt beverages—if such sale, purchase, offer, or contract is made in the course of interstate or foreign commerce, or if such person or trade buyer engages in such practice to such an extent as substantially to restrain or prevent transactions in interstate or foreign commerce in any such products or if the direct effect of such sale, purchase, offer, or contract is to prevent, deter, hinder, or restrict other persons from selling or offering for sale any such products to such trade buyer in interstate or foreign commerce: *Provided*, That this subsection shall not apply to transactions involving solely the bona fide return of merchandise for ordinary and usual commercial reasons arising after the merchandise has been sold; or

(e) Labeling

To sell or ship or deliver for sale or shipment, or otherwise introduce in interstate or foreign commerce, or to receive therein, or to remove from customs custody for consumption, any distilled spirits, wine, or malt beverages in bottles, unless such products are bottled, packaged, and labeled in conformity with such regulations, to be prescribed by the Secretary of the Treasury, with respect to packaging, marking, branding, and labeling and size and fill of container (1) as will prohibit deception of the consumer with respect to such products or the quantity thereof and as will prohibit, irrespective of falsity, such statements relating to age, manufacturing processes, analyses, guarantees, and scientific or irrelevant matters as the Secretary of the Treasury finds to be likely to mislead the consumer; (2) as will provide the consumer with adequate information as to the identity and quality of the products, the alcoholic content thereof (except that statements of, or statements likely to be considered as statements of, alcoholic content of malt beverages are prohibited unless required by State law and except that, in case of wines, statements of alcoholic content shall be required only for wines containing more than 14 per centum of alcohol by volume), the net contents of the package, and the manufacturer or bottler or importer of the product; (3) as will require an accurate statement, in the case of distilled spirits (other than cordials, liqueurs, and specialties) produced by blending or rectification, if neutral spirits have been used in the production thereof, informing the consumer of the percentage of neutral spirits so used and of the name of the commodity from which such neutral spirits have been distilled, or in case of neutral spirits or of gin produced by a process of continuous distillation, the name of the commodity from which distilled; (4) as will prohibit statements on the label that are disparaging of a competitor's products or are false, misleading, obscene, or indecent; and (5) as will prevent deception of the consumer by use of a trade or brand name that is the name of any living individual of public prominence, or existing private or public organization, or is a name that is in simulation or is an abbreviation thereof, and as will prevent the use of a graphic, pictorial, or emblematic representation of any such individual or organization, if the use of such name or representation is likely falsely to lead the consumer to believe that the product has been indorsed, made, or used by, or produced for, or under the supervision of, or in accordance with the specifications of, such individual or organization: *Provided*, That this clause shall not apply to the use of the name of any person engaged in business as a distiller, brewer, rectifier, blender, or other producer, or as an importer, wholesaler, retailer, bottler, or warehouseman, of distilled spirits, wine, or malt beverages, nor to the use by any person of a trade or brand name used by him or his predecessor in interest prior to August 29, 1935; including regulations requiring, at time of release from customs custody, certificates issued by foreign governments covering origin, age, and identity of imported products: *Provided further*, That nothing herein nor any decision, ruling, or regulation of any Department of the Government shall deny the right of any person to use any trade name or brand of foreign origin not presently effectively registered in the United States Patent and Trademark Office which has been used by such person or predecessors in the United States for a period of at least five years last past, if the use of such name or brand is qualified by the name of the locality in the United States in which the product is produced, and, in the case of the use of such name or brand on any label or in any advertisement, if such qualification is as conspicuous as such name or brand.

It shall be unlawful for any person to alter, mutilate, destroy, obliterate, or remove any mark, brand, or label upon distilled spirits, wine, or malt beverages held for sale in interstate or foreign commerce or after shipment therein, except as authorized by Federal law or except pursuant to regulations of the Secretary of the Treasury authorizing relabeling for purposes of compliance with the requirements of this subsection or of State law.

In order to prevent the sale or shipment or other introduction of distilled spirits, wine, or malt beverages in interstate or foreign commerce, if bottled, packaged, or labeled in violation of the requirements of this subsection, (1) no bottler of distilled spirits, no producer, blender, or wholesaler of wine, or proprietor of a bonded wine storeroom, and no brewer or wholesaler of malt beverages shall bottle, and (2) no person shall remove from customs custody, in bottles, for sale or any other commercial purpose, distilled spirits, wine, or malt beverages, respectively, after such date as the Secretary of the Treasury fixes as the earliest practicable date for the application of the provisions of this subsection to any class of such persons (but not later than August 15, 1936, in the case of distilled spirits, and December 15, 1936, in the case of wine and malt beverages, and only after thirty days' public notice), unless, upon application to the Secretary of the Treasury, he has obtained and has in his possession a certificate of label approval covering the distilled spirits, wine, or malt beverages, issued by the Secretary in such manner and form as he shall by regulations prescribe: *Provided*, That any such bottler of distilled spirits, or producer, blender, or wholesaler of wine, or proprietor of a bonded wine storeroom, or brewer or wholesaler of malt beverages shall be exempt from the requirements of this subsection if, upon application to the Secretary, he shows to the satisfaction of the Secretary that the distilled spirits, wine, or malt beverages to be bottled by the applicant are not to be sold, or offered for sale, or shipped or delivered for shipment, or otherwise introduced, in interstate or foreign commerce. Officers of internal revenue are authorized and directed to withhold the release of distilled spirits from the bottling plant unless such certificates have been obtained, or unless the application of the bottler for exemption has been granted by the Secretary; and customs officers are authorized and directed to withhold the release from customs custody of distilled spirits, wine, and malt beverages, unless such certificates have been obtained. The District Courts of the United States, and the United States court for any Territory shall have jurisdiction of suits to enjoin, annul, or suspend in whole or in part any final action by the Secretary upon any application under this subsection; or

(f) Advertising

To publish or disseminate or cause to be published or disseminated by radio broadcast, or in any newspaper, periodical or other publication or by any sign or outdoor advertisement or any other printed or graphic matter, any advertisement of distilled spirits, wine, or malt beverages, if such advertisement is in, or is calculated to induce sales in, interstate or foreign commerce, or is disseminated by mail, unless such advertisement is in conformity with such regulations, to be prescribed by the Secretary of the Treasury, (1) as will prevent deception of the consumer with respect to the products advertised and as will prohibit, irrespective of falsity, such statements relating to age, manufacturing processes, analyses, guaranties, and scientific or irrelevant matters as the Secretary of the Treasury finds to be likely to mislead the consumer; (2) as will provide the consumer with adequate information as to the identity and quality of the products advertised, the alcoholic content thereof (except the statements of, or statements likely to be considered as statements of, alcoholic content of malt beverages and wines are prohibited), and the person responsible for the advertisement; (3) as will require an accurate statement, in the case of distilled spirits (other than cordials, liqueurs, and specialties) produced by blending or rectification, if neutral spirits have been used in the production thereof, informing the consumer of the percentage of neutral spirits so used and of the name of the commodity from which such neutral spirits have been distilled, or in case of neutral spirits or of gin produced by a process of continuous distillation, the name of the commodity from which distilled; (4) as will prohibit statements that are disparaging of a competitor's products or are false, misleading, obscene, or indecent; (5) as will prevent statements inconsistent with any statement on the labeling of the products advertised. This subsection shall not apply to outdoor advertising in place on June 18, 1935, but shall apply upon replacement, restoration, or renovation of any such advertising. The prohibitions of this subsection and regulations thereunder shall not apply to the publisher of any newspaper, periodical, or other publication, or radio broadcaster, unless such publisher or radio broadcaster is engaged in business as a distiller, brewer, rectifier, or other producer, or as an importer or wholesaler, of distilled spirits, wine, or malt beverages, or as a bottler, or warehouseman and bottler, of distilled spirits, directly or indirectly or through an affiliate.

The provisions of subsections (a), (b), and (c) of this section shall not apply to any act done by an agency of a State or political subdivision thereof, or by any officer or employee of such agency.

In the case of malt beverages, the provisions of subsections (a), (b), (c), and (d) of this section shall apply to transactions between a retailer or trade buyer in any State and a brewer, importer, or wholesaler of malt beverages outside such State only to the extent that the law of such State imposes similar requirements with respect to similar transactions between a retailer or trade buyer in such State and a brewer, importer, or wholesaler of malt beverages in such State, as the case may be. In the case of malt beverages, the provisions of this subsection and subsection (e) of this section shall apply to the labeling of malt beverages sold or shipped or delivered for shipment or otherwise introduced into or received in any State from any place outside thereof, or the advertising of malt beverages intended to be sold or shipped or delivered for shipment or otherwise introduced into or received in any State from any place outside thereof, only to the extent that the law of such State imposes similar requirements with respect to the labeling or advertising, as the case may be, of malt beverages not sold or shipped or delivered for shipment or otherwise introduced into or received in such State from any place outside thereof.

The Secretary of the Treasury shall give reasonable public notice, and afford to interested parties opportunity for hearing, prior to prescribing regulations to carry out the provisions of this section.

(Aug. 29, 1935, ch. 814, § 5, 49 Stat. 981; Feb. 29, 1936, ch. 105, § 2, 49 Stat. 1152; June 25, 1936, ch. 804, 49 Stat. 1921; June 26, 1936, ch. 830, title V, §§ 505, 506, 49 Stat. 1965, 1966; 1940 Reorg. Plan No. III, § 2, eff. June 30, 1940, 5 F.R. 2108, 54 Stat. 1232; Apr. 29, 1942, ch. 244, § 1(h), 56 Stat. 219 June 25, 1948, ch. 646, § 32(b), 62 Stat. 991; May 24, 1949, ch. 139, § 127, 63 Stat. 107; Pub. L. 93-596, § 3, Jan. 2, 1975, 88 Stat. 1949.)

CODIFICATION

As originally enacted subsec. (e) of this section contained a reference to the Supreme Court of the District of Columbia. Act June 25, 1936, substituted "the district court of the United States for the District of Columbia" for "the Supreme Court of the District of Columbia", and act June 25, 1948, as amended by act May 24, 1949, substituted "United States District Court for the District of Columbia" for "district court of the United States for the District of Columbia". However, the words "United States District Court for the District of Columbia" have been deleted entirely as superfluous in view of section 132(a) of Title 28, Judiciary and Judicial Procedure, which states that "There shall be in each judicial district a district court which shall be a court of record known as the United States District Court for the district", and section 88 of Title 28 which states that "the District of Columbia constitutes one judicial district".

An amendment to the second proviso of subsec. (e) of this title was contained in act June 26, 1936, ch. 830, title V, § 506, 49 Stat. 1966. The amendment was to have taken effect when a majority of the members of the Federal Alcohol Administration authorized to be appointed under section 202b of this title took office. However, the members were never appointed and section 202b of this title was repealed by Pub. L. 89-554, § 8(a), Sept. 6, 1966, 80 Stat. 649.

AMENDMENTS

1942—Subsec. (f)(2). Act Apr. 29, 1942, substituted "beverages and wines are prohibited" for "beverages are prohibited and except that, in case of wines, statements of alcoholic content shall be required only for wines containing more than 14 per centum of alcohol by volume,".

1936—Subsec. (e). Act Feb. 29, 1936, substituted "August 15, 1936, in the case of distilled spirits, and December 15, 1936, in the case of wine and malt beverages" for "March 1, 1936,".

Subsec. (e). Act June 26, 1936, amended subsec. (e) generally.

CHANGE OF NAME

References to the Patent Office have been changed to the Patent and Trademark Office pursuant to Pub. L. 93-596, § 3, Jan. 2, 1975, 88 Stat. 1949, set out as a note under section 1 of Title 35, Patents.

TRANSFER OF FUNCTIONS

"Secretary of the Treasury" and "Secretary" were substituted in subsecs. (b), (e), and (f) for "Administrator", meaning the Administrator of the Federal Alcohol Administration, pursuant to Reorg. Plan No. III of 1940, see note set out under section 201 of this title.

SECTION REFERRED TO IN OTHER SECTIONS

This section is referred to in sections 204, 207 of this title; title 26 section 5306.

B. BATF DOCUMENTATION: BATF PRODUCT ALERT/INDUSTRY MEMO IN JULY 1985, SAMPLE LABEL APPROVAL AND ACTUAL LABEL FOR WINE CONTAINING DEG, AND MEMO ON BATF TASK FORCE

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, D.C. 20226

REFER TO
C:I:P:NLA

MEMORANDUM TO: All Regional Directors (Compliance)

DEPUTY
FROM: Associate Director
(Compliance Operations)

SUBJECT: Product Alert -- Industry Memorandum

Attached is a draft Industry Memorandum you should issue to Importers and Wholesalers concerning a Product Alert for Austrian wines which may contain diethylene glycol, a potentially poisonous substance. Due to the serious health implications associated with this matter, please expedite issuance of the Industry Memorandum. We suggest that the Industry Memorandum be printed on brightly colored paper to emphasize the urgency of the subject. Please ensure that all state alcohol beverage control agencies receive copies of the Industry Memorandum.

Please contact the Product Compliance Branch if you have any questions.

Robert J. Maxwell

Attachment

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, D.C. 20226

INDUSTRY MEMORANDUM ______

-- PRODUCT ALERT -- PRODUCT ALERT -- PRODUCT ALERT --
AUSTRIAN WINE CONTAINING DIETHYLENE GLYCOL

TO: WHOLESALERS AND IMPORTERS OF WINE AND OTHERS CONCERNED

We have received information that some wine produced in Austria has been made with diethylene glycol. This substance is a chemical which is used in anti-freeze and may cause nausea, kidney dysfunction or be lethal when ingested in certain quantities.

The Bureau is working with the United States Customs Service to ensure that shipments of Austrian wine entering into the United States do not contain diethylene glycol. This is being accomplished by requiring laboratory analysis of all Austrian wine for diethylene glycol prior to release from Customs Custody.

In order to ensure that Austrian wine already released from Customs Custody does not contain diethylene glycol, wholesalers and importers are requested to withhold all Austrian wines from sale pending verification that such wines do not contain diethylene glycol. This verification shall consist of an independent laboratory analysis performed by a certified laboratory.

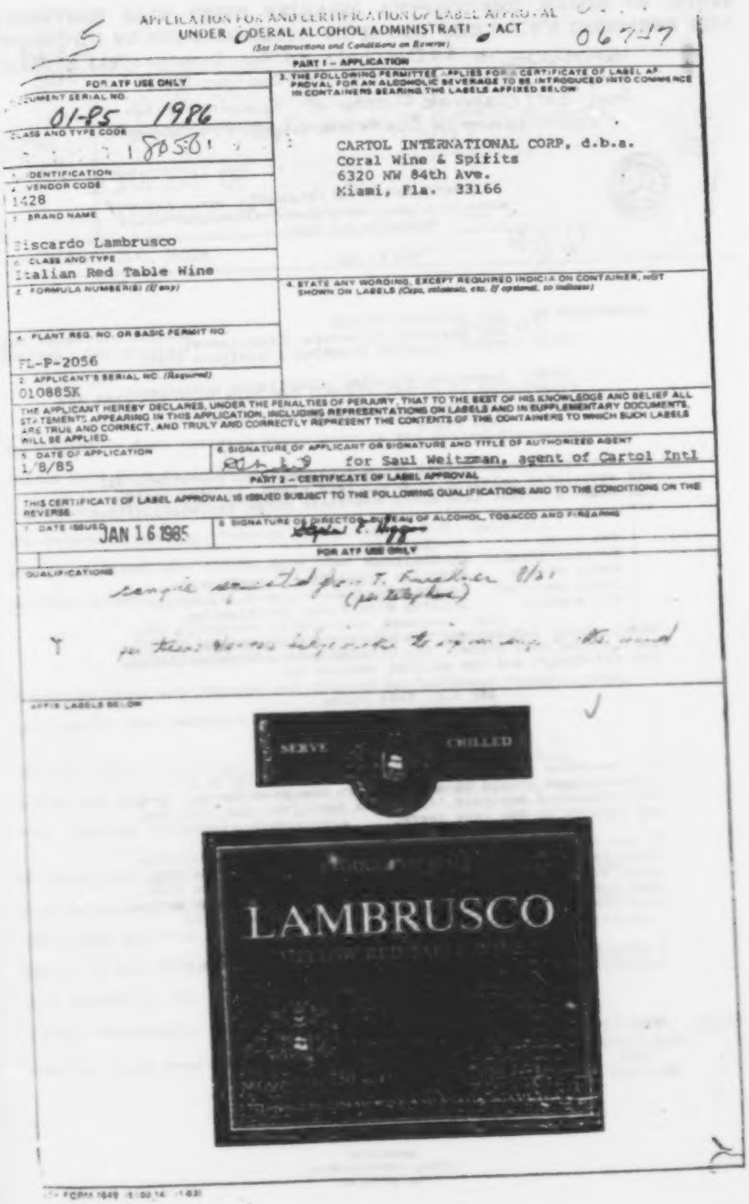
Products found to contain diethylene glycol will be considered mislabeled and not eligible for sale in the United States. Therefore, any wholesaler or importer who conducts transactions in any such Austrian wines on or after the date of this Product Alert without having such wines satisfactorily tested will be deemed to be in willful violation of the terms of their FAA Basic Permit. Such action could result in suspension or revocation of the Basic Permit.

Any person having questions regarding the laboratory analysis procedures to be used for detection of diethylene glycol should contact the ATF National Laboratory Center, Rockville, Maryland, (301)294-0410.

[redacted]TRY MEMORANDUM ______

The Product Compliance Branch, Bureau of Alcohol, Tobacco Firearms, 1200 Pennsylvania Avenue, NW, Washington, DC 20226, shall be supplied copies of all laboratory analyses conducted on Austrian wines and notified immediately at (202) 566-7595 or (202) 566-7401, when laboratory analyses show the presence of diethylene glycol.

Regional Director (Compliance)



5

APPLICATION FOR AND CERTIFICATION OF LABEL APPROVAL
UNDER FEDERAL ALCOHOL ADMINISTRATION ACT
(See Instructions and Conditions on Reverse)

06727

PART I – APPLICATION

FOR ATF USE ONLY	3. THE FOLLOWING PERMITTEE APPLIES FOR A CERTIFICATE OF LABEL APPROVAL FOR AN ALCOHOLIC BEVERAGE TO BE INTRODUCED INTO COMMERCE IN CONTAINERS BEARING THE LABELS AFFIXED BELOW CARTOL INTERNATIONAL CORP, d.b.a. Coral Wine & Spirits 6320 NW 84th Ave. Miami, Fla. 33166
DOCUMENT SERIAL NO. 01-85 1986	
CLASS AND TYPE CODE 180581	
1. IDENTIFICATION	
a. VENDOR CODE 1428	
b. BRAND NAME Biscardo Lambrusco	
c. CLASS AND TYPE Italian Red Table Wine	
d. FORMULA NUMBER(S) *(If any)*	4. STATE ANY WORDING, EXCEPT REQUIRED INDICIA ON CONTAINER, NOT SHOWN ON LABELS *(Caps, coloured, etc. If optional, so indicate)*
e. PLANT REG. NO. OR BASIC PERMIT NO. FL-P-2056	
2. APPLICANT'S SERIAL NO. *(Required)* 010885K	

THE APPLICANT HEREBY DECLARES, UNDER THE PENALTIES OF PERJURY, THAT TO THE BEST OF HIS KNOWLEDGE AND BELIEF ALL STATEMENTS APPEARING IN THIS APPLICATION, INCLUDING REPRESENTATIONS ON LABELS AND IN SUPPLEMENTARY DOCUMENTS, ARE TRUE AND CORRECT, AND TRULY AND CORRECTLY REPRESENT THE CONTENTS OF THE CONTAINERS TO WHICH SUCH LABELS WILL BE APPLIED.

5. DATE OF APPLICATION 1/8/85	6. SIGNATURE OF APPLICANT OR SIGNATURE AND TITLE OF AUTHORIZED AGENT for Saul Weitzman, agent of Cartol Intl

PART 2 – CERTIFICATE OF LABEL APPROVAL

THIS CERTIFICATE OF LABEL APPROVAL IS ISSUED SUBJECT TO THE FOLLOWING QUALIFICATIONS AND TO THE CONDITIONS ON THE REVERSE.

7. DATE ISSUED JAN 16 1985	8. SIGNATURE OF DIRECTOR, BUREAU OF ALCOHOL, TOBACCO AND FIREARMS Stephen E. Higgins

FOR ATF USE ONLY

QUALIFICATIONS

sample requested from T. [illegible] 8/21
(per telephone)

Y [illegible]

AFFIX LABELS BELOW

✓

ATF FORM 1649 (5100.14) (1-83)

Memorandum to All Div. Chiefs, All Reg Directors (Compliance) & Chief Program Planning & Analysis Staff from BATF Associate Director of Compliance Operations
- Establishment of Dyethelene Glycol TASK Force -

1/9/85

T-10
1

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, D.C. 20226

R P.18

AUG 2 3 1985

MEMORANDUM TO: All Division Chiefs
All Regional Directors (Compliance)
Chief, Program Planning & Analysis Staff

FROM: Associate Director (Compliance Operations)

SUBJECT: Establishment of Diethylene Glycol Task Force

We have established a task force to manage and coordinate all ATF activities relating to Diethylene Glycol tainted wines. The members of the task force and their major responsibilities are:

Tom Busey	Co-Chairman
Norris Alford	Co-Chairman
Wally Nelson	Austrian Wine/Hdqrs Coordination
Jerry Bowerman	German Wine/Laboratory Coordination
Art Resnick	Italian Wine/Field Coordination

Wally, Jerry and Art will be manning a command post as a part of the task force. The command post telephone numbers are 535-6245/6 and its mailing address is:

ATF D.G. Task Force
Room 6216
1200 Pennsylvania Ave. N.W.
Washington, DC 20226

All telephone calls and correspondence relating to D.G. tainted wines should be addressed to the task force. Send all laboratory analysis reports on Austrian wine that you may receive to the task force.

If you have information and the coordinator is unavailable, leave the information with any task force member; it will immediately be acted upon. Similarily, from time to time task force members will be requesting information or action from your offices. I expect a similar high degree of responsiveness to their requests.

I know I can count on all of you to help us resolve this critical problem.

W. T. Drake
William T. Drake

Source, Norris Alford
Chief, Product Compliance Branch
ATF
566-7595

Rm. 6205
1200 Pa. Ave.

UNITED STATES
GENERAL ACCOUNTING OFFICE
Form 207 (Dec. 66)

C. THIRTEEN BATF PRESS RELEASES ANNOUNCING NAMES OF WINES FOUND TO BE CONTAMINATED WITH DEG AND BATF'S DECEMBER 1985 MASTER LIST

Department of the Treasury
BUREAU OF ALCOHOL, TOBACCO & FIREARMS
NEWS
WASHINGTON, D.C. 20226
24 HOUR TELEPHONE [illegible]

For Immediate Release
Contact: Dot Koester

FY-85-113
July 18, 1985

ATF SAYS AUSTRIAN WINE MAY CONTAIN TRACES OF ANTI-FREEZE

Washington -- Some Austrian wines sold in the United States and Canada have been found to contain traces of diethylene glycol, a chemical used in anti-freeze. Stephen E. Higgins, Director of the Bureau of Alcohol, Tobacco and Firearms (ATF) said the traces of diethylene glycol have been found in the following Austrian wines:

1983 Illmitzen Felsonecker Beerenauslese
1983 Illmitzen Kaisergarten Beerenauslese
1983 Ruster Beerenauslese

All three wines are bottled and shipped by Ferdinand Pieroth, Gmbh, Burg Layen, West Germany.

Higgins warned people not to drink the wine, cautioning that diethylene glycol may cause nausea, kidney dysfunction or death when ingested in certain quanitities.

He added that ATF is taking several steps to ensure that Austrian wine is safe to drink: 1) ATF and Customs are requiring a complete laboratory analysis of all Austrian wine for diethylene glycol before it enters the United States; 2) To make sure that Austrian wine already in the United States does not contain diethylene glycol, wholesalers and importers are being asked to withhold Austrian wines from sale pending laboratory tests.

Austrian wines found to contain the anti-freeze will be considered mislabeled and not eligible for sale in the United States. Any wholesaler or importer who sells Austrian wines after July 18, 1985 without having the wines thoroughly tested could have his or her permit suspended or revoked.

Additional alerts will be issued when and if more information becomes available.

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Department of the Treasury
BUREAU OF ALCOHOL, TOBACCO & FIREARMS
NEWS
STON, D.C. 20226
24 HOUR TELEPHONE: [illegible]

For Immediate Release
Contact: Tom Hill

FY-85-117
July 24, 1985

ATF WARNS CONSUMERS NOT TO DRINK AUSTRIAN WINES

Washington -- Stephen E. Higgins, Director of the Bureau of Alcohol, Tobacco and Firearms (ATF) today urged consumers not to drink any Austrian wines because of traces of diethylene glycol, a chemical used in anti-freeze were found in additional brands.

In addition, Director Higgins recommends that retailers not sell any Austrian wines that have not been tested. Retailers should check with their suppliers to ensure that current stocks and any future shipments are tested. The wines must be tested by independent labs either certified by the Food & Drug Administration (FDA) or appropriate state or local agencies.

Since July 18, ATF has taken several steps to ensure that Austrian wine is safe to drink: 1) ATF and the U.S. Customs Service are requiring a complete laboratory anaylsis of all Austrian wine before it enters the United States; 2) wholesalers and importers are being asked to withhold Austrian wines from sale pending laboratory tests.

As a result of these actions, ATF has preliminary indications from laboratory tests that additional Austrian brands contain diethylene glycol. Director Higgins stated that we are in contact with the Austrian and West German Governments regarding

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the full extent of the problem. Higgins noted, however, that "our information indicates that this adulteration may be more widespread than originally thought based on results of our continuing testing."

Austrian wines found to contain the anti-freeze will be considered mislabeled and not eligible for sale in the United States. Any wholesaler or importer who sells Austrian wines after July 18, 1985 without having the wines tested could have their permit suspended or revoked.

ATF will advise consumers and industry groups when the adulteration problem has been resolved and it is safe to drink Austrian wines.

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Department of the Treasury
BUREAU OF ALCOHOL,
TOBACCO & FIREARMS
NEWS
WASHINGTON, D.C. 20226
24 HOUR TELEPHONE: [illegible]

For Immediate Release
Contact: Dot Koester

FY-85-131
August 15,1985

ATF FINDS DIETHYLENE GLYCOL IN 26 BRANDS OF AUSTRIAN WINES

Washington -- Inits continuous testing program, the Bureau of Alcohol, Tobacco and Firearms (ATF) has found diethylene glycol in 26 Austrian wines out of 167 tested to date, according to ATF Director Stephen E. Higgins.

Higgins noted that "the amounts of diethylene glycol found in the contaminated Austrian wines range from 0.01 to 16 grams." He said, "There are approximately 1500 Austrian labels approved for use in the United States and testing is expected to continue for sometime. In addition to conducting our own tests, we receive testing reports from wholesalers, importers and some state agencies. If those reports indicate the presence of diethylene glycol, we then retest for confirmation."

Higgins emphasized that the list of 26 brands identified does not mean that all other Austrian wine is safe, but rather that these are the wines with confirmed diethylene glycol and that the testing is continuing.

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The 26 brands found to date which contain diethylene glycol are as follows:

1982 St. Margarethener Auslese
Shipped and bottled by: Weinkellerei Jos.v.Dawen Sohne
Urzig/Mosel, Germany

1981 Gumpoldskirchner Doktor Spatlese
Produced by: Dr. Ernst Weigl, Gumpoldskirchen, Austria

1983 Ruster Beerenauslese
Shipped and bottled by: Ferdinand Pieroth Weinbau -
Weinkellerei GMBH
Burg Layen, West Germany

1981 St. Margarethener Beerenauslese
Shipped and bottled by: Weinkellerei Jos.v.Dawen Sohne
Urzig/Mosel, Germany

1981 Rust Neusiedlersee Trockenbeerenauslese
Shipped and bottled by: Weinkellerei Jos.v.Dawen Sohne
Urzig/Mosel, Germany

1980 St. Margarthener Trockenbeerenauslese
Shipped and bottled by: Ferdinand Pieroth GMBH
Burg Layen, West Germany

1979 Breitenbrunner Welschriesling Beerenauslese
Shipped and bottled by: Ferdinand Pieroth GMBH
Burg Layen, West Germany

1983 Illmitzer Felsonecker Beerenauslese
Shipped and bottled by: Ferdinand Pieroth GMBH
Burg Layen, West Germany

1983 Illmitzer Kaisergarten Beerenauslese
Shipped and bottled by: Ferdinand Pieroth Weinbau -
Weinkellerei GMBH
Burg Layen, West Germany

-more-

1983 Pelser Schillingsberg Eiswein
Shipped and bottled by: Ferdinand Pieroth Weinbau -
Weinkellerei GMBH
Burg Layen, West Germany

1980 Rust-Neusiedlersee Eiswein Beerenauslese - Rulander
Shipped by: Wein-Bauer, Stockerau, Austria

1983 Podersdorfer Kaisergarten Beerenauslese
Shipped and bottled by: Ferdinand Pieroth Weinbau -
Weinkellerei GMBH
Burg Layen, West Germany

1979 Pamhagener (Rose Wine)
Shipped and bottled by: Ferdinand Pieroth Weinbau -
Weinkellerei GMBH
Burg Layen, West Germany

1981 Edelstaler Kaisergarten Trockenbeerenauslese
Shipped and bottled by: Ferdinand Pieroth - Weinkellerei GMBH
Burg Layen, West Germany

1981 Weidener Kaisergarten Trockenbeerenauslese
Shipped and bottled by: Ferdinand Pieroth Weinbau
Weinkellerei GMBH
Burg Layer, West Germany

1980 Edelstaler Kupferhohe Eiswein (Gewurztraminer)
Shipped by: Ferdinand Pieroth Weinbau
Weinkellerei GMBH
Bottled by: Weingut Haller, Monchhof, Austria

1980 Monchhofer Steingang Trockenbeerenauslese
Bottled by: Weingut Haller, Monchhof, Austria

1984 Osterreich Neusiedler See Spatlese
(Karl Walden Selection)
Bottled by: Richard Trimborn
Bad Kreuznach, Germany

-more-

1982 Gruner Veltliner Kabinett (Pustaqueen)
Bottled and shipped by: J. Hafner, Monchhof, Austria

1982 Rust Neusiedlersee Spatlese
Shipped by: Weinkellerei St. Kunibert GMBH
Leiwen, Germany

1979 Ruster Trockenbeerenauslese (Weiss-Burgunder)
Shipped by: All Austrian Wines and Spirits
Vienna, Austria

1982 Donnerskirchner Beerenauslese Bouviertraube
Shipped and bottled by: Ferdinand Pieroth GMBH
Bury Layen, West Germany

1982 Oggauer Welschriesling
(Weinbaugebiet Rust/Neusiedlersee)
Produced by: Weingut Ges.M.B.H. Sepp Hold
St. Georgen, Austria

1978 Ruster Eiswein Traminer Auslese
Shipped by: All Austrian Wines and Spirits
Vienna, Austria

Since July 18 when the diethylene glycol was first discovered in Austrian wines exported to the United States, the Bureau of Alcohol, Tobacco and Firearms has conducted a continuing testing program at its Rockville, MD. laboratory; is working with U.S. Customs in testing all Austrian wines being imported into the country; and has cautioned importers and wholesalers not to sell any Austrian wine after July 18 unless it has been tested by a certified laboratory.

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Department of the Treasury
BUREAU OF ALCOHOL, TOBACCO & FIREARMS
NEWS
ASHINGTON, D.C. 20225
24 HOUR TELEPHONE:

For Immediate Release
Contact: Dot Koester

FY-85-132
August 15,1985

ONE GERMAN WINE FOUND TO CONTAIN SMALL TRACE OF DIETHYLENE GLYCOL

Washington -- The Bureau of Alcohol, Tobacco and Firearms, the Treasury bureau which has been testing imported wines for the presence of diethylene glycol, said today their testing has uncovered a small amount -- 0.1 gram per liter in a German wine exported to the United States.

The wine is a 1984 Haus of Franz Liebfraumilch
Nahe
Cualitatswein A.P. Nr 1 907 021 129 84
Shipped by: Abfuller Weinkellerei
Johann Falkenburg GMBH
Bernkastel-Kues

Bill Drake, Deputy Director of ATF, said that since ATF's extensive testing of German wines has uncovered only one and that one with a small amount of diethylene glycol, plus the assurance that the West German Government is conducting its own widespread tests on German wine, ATF is not requiring importers and wholesalers to test all German wine at this time.

ATF's testing of imported wines will continue, and if additional wines are found to contain diethylene glycol, ATF will take the appropriate action.

-more-

Reports from the West German Government state that the Germans have found in Germany some German wines that contain diethylene glycol, but to the best of their knowledge, none of these wines have been exported to the United States.

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Department of the Treasury
BUREAU OF ALCOHOL
TOBACCO & FIREARMS
NEWS
ASHINGTON, D.C. 20226
24 HOUR TELEPHONE

For Immediate Release
Contact: Tom Hill

FY-85-134
August 27, 1985

Update on Austrian Wine Contamination

Washington--Stephen E. Higgins, Director of the Bureau of Alcohol, Tobacco and Firearms announces that diethylene glycol had been found in 35 Austrian wine brands out of 216 tested to date.

Higgins noted that ATF is continually testing Austrian wine and will be issuing updates as the testing warrants. On August 15, ATF identified 26 brands. The nine additional brands which contain diethylene glycol are as follows:

1983 Eiswein Riesling Traminer
Shipped and bottled by Weingut Alexander Unger
St. Margarethen, Austria

1981 Rust Neusiedlersee Blaufrankisch Spatlese
Shipped and bottled by Johann Pfeiffer GMBH
Wittlich, West Germany

1979 Monchhofer Kaisergarten Beerenauslese
Shipped and bottled by Ferdinand Pieroth GMBH
Burg Layen, West Germany

1978 Illmitzer Kaisergarten Spaetlese
Shipped and bottled by Ferdinand Pieroth GMBH
Burg Layen, West Germany

1982 Pustaqueen Gruner Veltliner Kabinett
Shipped and bottled by J. Hafner
Monchhof, Austria

1979 Ruster Altenberg Muller Thurgau Auslese
Shipped and bottled by Wein Bauer
Stockerau, Austria

1982 Osterreich Neusiedler See Spaetlese
Shipped and bottled by Richard Trimborn GMBH
Bad Kreuznach, West Germany

-more-

1983 Osterreich Neusiedler See Spaetlese
Shipped and bottled by Richard Trimborn GMBH
Bad Kreuznach, West Germany

1983 St. Margarethener Beerenauslese Welschriesling
Shipped and bottled by Johann Pfeiffer GMBH
Wittlich, West Germany

Since July 18, ATF has conducted a continuing testing program at its laboratories in Rockville, MD and San Francisco, CA; is working with the U.S. Customs Service to test all Austrian wines being imported into the country; and has cautioned importers and wholesalers not to sell any Austrian wines after July 18 unless it has been tested by a certified laboratory in the United States.

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Department of the Treasury
BUREAU OF ALCOHOL, TOBACCO & FIREARMS **NEWS**
WASHINGTON, D.C. 20226
24 HOUR TELEPHONE:

For Immediate Release
Contact: Dot Koester

FY-85-138
September 10,1985

ATF FINDS ADDITIONAL GERMAN WINES WITH TRACES OF DIETHYLENE GLYCOL

Washington -- Four additional German wines containing small amounts of diethylene glycol have been found by the Bureau of Alcohol, Tobacco and Firearms (ATF), the Treasury bureau which has been testing imported wines for diethylene glycol since the middle of July. This brings the total of contaminated German wines to five found in the United States. In each case, the amounts of diethylene glycol detected in the German wines have been trace amounts.

The five wines are as follows:

1984 Haus of Franz Liebfraumilch (reported August 15,1985)
Nahe
Qualitatswein A.P. Nr 1 907 021 29 84
Shipped by: Abfuller Weinkellerei, Johann Falkenburg GmbH.
Bernkastel-Kues

1984 Haus Frickenstein Liebfraumilch
Nahe
Qualitatswein A.P. No. 1 907 021 29 84
Shipped by: C.A. Warren GmbH. & Co. KG.,
Essen
Bottled by: Abfuller Sommerauer Schlosbergkellerei GmbH.,
Sommerau Abfullort Bernkastel-Kues

1984 Haus of Franz Liebfraumilch
Rheinpfalz
Qualitatswein A.P. No. 5 907 021 518 84
Shipped by: Abfuller Weinkellerei Johann Falkenburg GmbH.
Bernkastel-Kues

-more-

1982 Wolfsheimer Abtey Kabinett
Rheinhessen
White Wine
A.P. Nr 4 907 183 109 84
Bottled by: Ferdinand Pieroth GmbH Weinbau-Weinkellerei
Burg Layen

1983 Saulheimer Domherr Eiswein
Rheinhessen
A.P. Nr 4 907 183 108 84
Bottled by: Phillipp und Heinrich Baum Weinkellerei GmbH
Bad Kreuznach

ATF Deputy Director Bill Drake said consumers who own any of the contaminated brands should either return the bottles to the retailer or dispose of them.Drake also indicated that the additional German wines were tested based on information from the West German Government. He noted the continuing cooperation of the West German Government in assisting ATF in tracking German wines containing diethylene glycol.

To date, ATF's continuing testing of imported wines has detected diethylene glycol in 40 Austrian wines, in addition to the five German wines.

If further instances of contamination are found, ATF will continue to notify wholesalers, importers and consumers.

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Department of the Treasury
BUREAU OF ALCOHOL, TOBACCO & FIREARMS
NEWS
…HINGTON, D.C. 20226
24 HOUR TELEPH[illegible]

For Immediate Release
Contact: Dot Koester

FY-85-139
September 12,1985

ATF FINDS TRACES OF DIETHYLENE GLYCOL IN EIGHT ITALIAN WINES

Washington -- The Bureau of Alcohol, Tobacco and Firearms (ATF), in its continuing testing of imported wines, has detected small amounts of diethylene glycol in eight Italian wines.

The wines are labeled as follows:

1981 Barbera D'Asti
Bottled by: F. Lli Dogliani S.p.A.
La Morra, Italy

1980 Barbaresco
Bottled by: F. Lli Dogliani S.p.A.
La Morra, Italy

Kiola
1979 Barolo
Bottled by: FDO S.p.A.
La Morra, Italy

1973 Gattinara
Bottled by: F.Lli Dogliani S.p.A.
La Morra, Italy

Lambrusco
Bottled by: Spabis S.p.A.
Calmasino, Italia

Asti Spumante
Bottled by: F.Lli Dogliani S.p.A.
La Morra, Italy

-more-

1981 D'Aquino
Barbera D'Asti
Bottled by: F.Lli Dogliani
La Morra, Italy

1980 Kiola
Barbaresco
Bottled by: FDO S.p.A.
La Morra, Italy

Since July 18, ATF's testing program has found diethylene glycol in 40 Austrian wines, five German wines and the eight Italian wines.

William T. Drake, ATF's Deputy Director, said consumers who own any of the contaminated wine should either return the bottles to the retailer or dispose of them.

If further instances of contamination are found, ATF will continue to notify wholesalers, importers and consumers.

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Department of the Treasury
BUREAU OF ALCOHOL, TOBACCO & FIREARMS NEWS
ASHINGTON, D.C. 20226 24 HOUR TELEPHONE: [illegible]

For Immediate Release
Contact: Dot Koester

FY-85-140
September 17,1985

UPDATE ON AUSTRIAN WINE CONTAINING DIETHYLENE GLYCOL

Washington -- The Bureau of Alcohol, Tobacco and Firearms (ATF) has detected diethylene glycol in eight additional Austrian wines, bringing the total of contaminated Austrian wines to 42.

The additional brands are as follows:

1981 Rust Neusiedlersee Trockenbeerenauslese
Bottled and shipped by: Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

1981 Rust Neusiedlerse Trockenbeerenausles
Bottled and shipped by: Saint Charles Weinkellerei GmbH
Bernkastel-Kues

1982 Falkensteiner Gruner Veltliner
Bottled and shipped by: Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

1982 Falkensteiner Gruner Veltliner
Bottled and shipped by: Saint Charles Weinkellerei GmbH
Bernkastel-Kues

1982 St. Margarethener Auslese Welschriesling
Bottled and shipped by: Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

1983 St. Margarethener Welschriesling Beerenauslese
Bottled and shipped by: Weinbau Ewald Pfeiffer, GmbH
Urzig/Mosel, Germany

-more-

1981 Rust Neusiedleree Traminer Trockenbeerenauslese
Bottled and shipped by: Johann Pfeiffer
Urzig/Mosel, Germany

1982 St. Georgener Spatlese Weissburgunder
Bottled and shipped by: Weinbau Ewald Pfeiffer
Urzig/Mosel, Germany

ATF is continuing to test imported wines and will issue updates as the testing warrants.

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Department of the Treasury
BUREAU OF ALCOHOL, TOBACCO & FIREARMS
NEWS
WASHINGTON, D.C. 20226
24 HOUR TELEPHONE (202) [illegible]

For Immediate Release
Contact: Dot Koester

FY-86-09
October 31,1985

ATF FINDS DIETHYLENE GLYCOL IN FOUR RIUNITE BRANDS

Washington -- Stephen E. Higgins, Director of the Bureau of Alcohol, Tobacco and Firearms (ATF) said today that ATF's laboratory had discovered traces of diethylene glycol in the following Riunite wine imports:

Riunite Bianco -- 750 ml -- Code No. 1124/RE

Riunite Rosato -- 750 ml -- Code No. 1124/RE
also a 1.5 liter Rosato-- Code No. 3321/BR

Riunite Lambrusco dell 'Emilia -- 750 ml -- Code No. 1124/RE

Riunite Spumante -- 750 ml -- Code No. 813/RE

Higgins advised consumers to look for the code number on the far right side of the label in very small lettering, except for the Spumante where the code number is on the foil covering over the cork. "It's the only way to identify those Riunite brands containing diethylene glycol," he said, adding that consumers should return the wines containing diethylene glycol to the retailer.

According to Higgins, diethylene glycol is a chemical commonly used for industrial purposes, and is not approved for use in food and beverages.

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Diethylene glycol has both short-term and cumulative effects, depending on the amount ingested.

Higgins noted that although the amounts of diethylene glycol contained in the wines are small (0.008 grams per liter), the importer, Banfi Products Corporation, has agreed to conduct a a recall of the products.

To date, ATF has tested over 1,000 brands of imported wines and has found diethylene glycol in 45 Austrian, 5 German and, with the four Riunite brands, 12 Italian wines.

The testing is continuing, and if additional wines are found to contain diethylene glycol, ATF will provide further consumer advisories as necessary.

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Department of the Treasury
BUREAU OF ALCOHOL,
TOBACCO & FIREARMS
NEWS
GTON, D.C. 20226
24 HOUR TELEPHONE

For Immediate Release
Contact: Dot Koester

FY-86-12
November 8, 1985

DIETHYLENE GLYCOL FOUND IN SEVEN ADDITIONAL ITALIAN WINES

Washington -- As part of the Bureau of Alcohol, Tobacco and Firearm's continuing testing program of imported wines, seven additional Italian wines have been found to contain diethylene glycol:

1979 D'Aquino
Barbaresco
Bottled by F.Lli Dogliani s.p.a.
La Morra - Piedmont

1981 Valenti
Barbaresco
Bottled by FDO S.p.A.
La Morra - Italy

1983 Valenti
Barbera d'Alba
Bottled by FDO S.p.A.
La Morra - Italy

1980 Valenti
Barolo
Bottled by FDO S.p.A.
La Morra - Italy

1981 Spanna
Del Piemonte
Bottled by Azienda Vinicola
Castello Di Lozzolo
Lozzolo, Italia

1973 Valenti
Gattinara
Bottled by FDO S.p.A.
La Morra - Italy

-more-

1978 Valenti
Barolo Riserva
Bottled by FDO S.p.A.
La Morra - Italy

Diethylene glycol is a chemical commonly used for industrial purposes and may have short-term and cumulative health effects. The amounts of diethylene glycol found in the Italian wines are considered small (0. 012 to 0.06 grams per liter or 12 to 60 parts per million).

ATF suggests that if consumers have any bottles of the wines listed, they return them to the retailer.

ATF is continuing its testing program, and will issue consumer advisories if diethylene glycol is found in any additional wines.

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Department of the Treasury

BUREAU OF ALCOHOL, TOBACCO & FIREARMS **NEWS**

WASHINGTON, D.C. 20226 24 HOUR TELEPHONE

For Immediate Release
Contact: Dot Koester

FY-86-13
November 8,1985

11 AUSTRIAN WINES CONTAIN HIGH LEVELS OF DIETHYLENE GLYCOL

Washington -- Stephen E. Higgins, Director of the Bureau of Alcohol, Tobacco and Firearms (ATF) said today the ATF laboratory has found high levels of diethylene glycol (.200 to 19.660 grams per liter or 200 to 19,660 parts per million) in 11 additional Austrian wines:

1981 Bouvier Trockenbeerenauslese
Region Rust-Neusiedlersee
Bottled and Shipped by: Bruder Grill Weingut
Fels-Krems, Austria

1983 St. Margarethener Beerenauslese Welschriesling
Bottled and Shipped by: Weinbau Ewald Pfeiffer,
Urzig/Mosel, Germany

1979 Halbturner Kupferfels Auslese-Eiswein
Bottled: Weingut Haller, Monchhof, Austria
Shipped by: Ferdinand Pieroth GmbH,
Burg Layen, West Germany

1980 Frauenkirchner Steingang Eiswein
Bottled and Shipped by: Weingut Morhof
St. Margarethin, Austria

1979 Retzer Altenberg
Gruner Veltliner
Serial No. CH-79-001
White Wine
Produced by: Wein-Bauer, Stockerau, Austria

-more-

1979 Gumpoldskirchner Rotgipfler
White Wine
Serial No. CH-79-004
Produced by: Wein-Bauer, Stockerau, Austria

1979 Altenberg Riesling
White Wine
Serial No. CH-79-003
Produced by: Wein-Bauer, Stockerau, Austria

1979 Rot Altenberg
Red Light Wine
Serial No. CH-79-005
Produced by: Wein-Bauer, Stockerau, Austria

1982 Muskat Ottonel Auslese
Region Rust-Neusiedlersee
Bottled and Shipped by: Bruder Grill Weingut
Fels-Krems, Austria

1982 Gruner Veltliner Spatlese
Region Klosterneuberg
Bottled and Shipped by: Bruder Grill Weingut
Fels-Krems, Austria

1982 St. Georgener Spatlese
Burgenland - Rust - Neusiedlersee
Bottled in Neumagen-Dhron,
Shipped by Intergena KG, Weinkellerei
Schermbeck/Reinland - West Germany

Higgins said "Last July when ATF first discovered diethylene glycol in Austrian wines, we took several steps to ensure the American consumer was protected: 1) ATF and the U.S.Customs Service required a complete laboratory analysis of all Austrian wine before it entered the United States; 2) ATF asked all wholesalers and importers to withhold all Austrian wines from sale pending testing. Any wholesaler or importer who sold Austrian wines without testing could have his or her permit revoked."

-more-

"Diethylene glycol is a chemical used for industrial purposes, and in these amounts, poses a definite health hazard," Higgins said, adding that if any consumer see these wines on a retailer's shelves, he or she should report it to the nearest office of the Bureau of Alcohol, Tobacco and Firearms."

"Our concern is also for the consumer who may have some of these brands in their homes. We repeat again -- do not drink the wine. Either return it to the retailer or dispose of it," Higgins said.

ATF will continue its testing of imported wines, and will issue further consumer advisories as necessary.

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Department of the Treasury

BUREAU OF ALCOHOL
TOBACCO & FIREARMS

NEWS

ASHINGTON, D.C. 20226

24 HOUR TELEPH[illegible]

For Immediate Release
Contact: Dot Koester

FY-86-20
November 27,1985

ATF FINDS DIETHYLENE GLYCOL IN ADDITIONAL IMPORTED WINES

Washington — Varying amounts — from 0.005 to 10 grams per liter (5 to 10,000 parts per million) of diethylene glycol, a chemical used in some industrial products, have been found in four additional wine imports, according to Stephen E. Higgins, Director of the Bureau of Alcohol, Tobacco and Firearms (ATF), the Treasury bureau which has been testing imported wines for the chemical since last July.

All four of the wines - two German, one Italian and one Austrian - are either shipped or bottled by Ferdinand Pieroth, Burg Layen, West Germany.

The wines are as follows:

1979 Westhofener Bergkloster
A.P. Nr 4 907 183 3780
White AUSLESE Grape Wine
Product of Germany

Contessina
1984 Vino da Tavola
Vino rosa, Toscana
Product of Italy

1984 Bad Durkheimer Feuerberg
Kabinett
White Grape Wine
A.P. Nr 5 907 183 6685
RHEINPFALZ
Product of Germany

-more-

1978 Kirchberger Konigsbutt
Gruner-Veltliner
Eiswein-Beerenauslese
Product of Austria

Depending on the amounts ingested, diethylene glycol may have both short-term and cumulative effects. Higgins suggested consumers return the listed wines to the retailer, adding that if consumers see any of the contaminated wines on the retailer's shelves, it should be reported to the nearest ATF office.

ATF is continuing its testing program, and will issue further consumer advisories, as necessary.

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Department of the Treasury
BUREAU OF ALCOHOL, TOBACCO & FIREARMS NEWS
SHINGTON, D.C. 20226
24 HOUR TELEP[illegible]

For Immediate Release
Contact: Dot Koester

FY-86-31
January 8, 1986

ATF FINDS DIETHYLENE GLYCOL IN FOUR MORE ITALIAN WINES

Washington -Diethylene glycol, a chemical used in some household products, has been found in four additional Italian wine imports, according to William T. Drake, Associate Director of Compliance Operations in the Bureau of Alcohol, Tobacco and Firearms (ATF), the Treasury bureau which has been testing imported wines for the chemical since last July.

The wines are labeled as follows:

1983 Castelvecio
1.5 liters
SOAVE
Denominazione Di Origine Controllata
Classico
Product of Italy
Bottled by Casa Vinicola V.B.T. S.p.A. Calmasino, Italy

1982 la Nebbia
750 ml.
bianco
della provincia di Sondrio
Imbottigliato dalla Casa Vinicola
Enologica Valtellinese
S.p.A.
Sondrio Italia
Product of Italy

-more-

1983 Vietti
Moscato Del Piemonte
mosto d'uva parzialmente fermentato
IMB. SES - Castiglione T - R.I 2001/2 CN -750 ml
White Table Wine
Product of Italy
5.5 % Alcohol By Volume
Bottled by: Dalle Cantine Vietti Castiglione Falletto

1983 Vietti
vino da tavola barbera del Piemonte
750 ml.
Red Table Wine
Product of Italy
Bottled by: Vietti Castiglione Falletto

Depending upon the amounts ingested, diethylene glycol may have both short- and long-term health effects. In the four most recent cases, the wines contained from 3 to 29 parts per million.

Drake suggested that consumers return the contaminated wines to the retailer.

ATF is continuing its testing program and will issue further consumer advisories, as necessary.

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Department of the Treasury

BUREAU OF ALCOHOL, TOBACCO & FIREARMS **NEWS**

WASHINGTON, D.C. 20226 **24 HOUR TELEPHONE: (202) 566-7135**

For Immediate Release FY-86-52
Contact: Dot Koester April 15, 1986

10 ADDITIONAL IMPORTED WINES CONTAIN DIETHYLENE GLYCOL

Washington -- The Bureau of Alcohol, Tobacco and Firearms (ATF) said today its laboratory, which has been testing imported wines for diethylene glycol since last summer, has found the substance in 10 additional imported Austrian, German and Italian wines. This brings the total of contaminated imported wines to 95, 25 of which have been bottled and shipped by Ferdinand Pieroth of Burg Layen.

Diethyelene glycol, which can have both short- and long-term health effects, has been found in varying low levels from 3 ppm to 45 ppm in the following wines:

Austrian

1976 Edelstaler Trockenbeerenauslese
Bouvier u. Muskat-Ottonel
White Grape Wine
Bottled and shipped by Ferdinand Pieroth, Burg Layen, West Germany

Ruster Red
WPG Rust-Neusiedlersee
Shipped by: All Austrian Wines & Spirits, Vienna

-more-

German

1983 Gau-Kongerheimer Vogelsang
White Eiswein Grape
Rheinhessen, Rulander
Qualitatswein mit Pradikat
Product of Germany
Bottled by Graflich Eltseche Wein - And Sektkellerei,
  Burg Elts GmBH
AP #4 907 183 74 84

1978 St. Martiner Schlos Ludwigshohe
White Grape Wine
Qualitatswein mit Pradikat
Beerenauslese
Bottled and shipped by Ferdinand Pieroth, Burg Layen, West Germany
AP #5 907 183 99 79

Italian

1983 Tenuta Di Pomino DOC
Marchesi De Frescobaldi
White Wine
Product of Italy

1978 Berra Gattinara
Estate Bottled
Guido Berra : Figlio
Product of Italy

1983 Fattoria Paradiso
Vigna dello Spungone
Estate Bottled by Mario Ferri
Pagadebit
White table wine of Bertinoro

1971 Kiola
Barolo D.O.C.
Product of Italy
Bottled by FDO S.p.A. - La Morra, Italy

1983 Valenti
Dolcetto d'Alba DOC
Product of Italy
Bottled by FDO S.p.A. - La Morra, Italy

-more-

1984 Valenti
Chardonnay
Langhe, Piedmont
Product of Italy
Bottled by FDO S.p.A.

ATF Deputy Director William T. Drake said consumers who own any of the contaminated brands either should return them to the retailer or dispose of them.

ATF's testing program is continuing. If additional wines are found containing diethylene glycol, ATF will continue to issue consumer advisories.

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T-16
2a 12/10/

(page 1) (Updated as of 00/00/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
1. 1982 St. Margarethener Auslese Imported by: The Great American Wine Co. Bridgeport, CT Shipped and bottled by: Weinkellerei Jos. v. Dawen Sohne Urzig/Mosel, Germany	0.5 g/liter
2. 1981 Gumpoldskirchner Doktor Spatlese Imported by: Chateau and Estate Wines Comp. New York, New York Produced by: Dr. Ernst Weigl Gumpoldskirchen, Austria	2.2 g/liter
3. 1982 Weissburgunder Pinot Blanc Dry Cabinet Imported by: Interport Corporation, Ashland, Virginia Produced by: Weingut Sepp Hold, St. Georgen, Austria	0.5 g/liter
4. 1981 St. Margarethener Beerenauslese Imported by: The Great American Wine Co. Bridgeport, CT Shipped and bottled by: Weinkellerei Jos. v. Dawen Sohne Urzig/Mosel, Germany	0.9 g/liter

INFO: Jerry Bowerman 12/10/85
BATF, Alcohol Export-Import Branch
Rm. 6216 535-6245

(Page 2) (Updated as of 11/12/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
5. 1981 Rust Neusiedlersee Trockenbeerenauslese Imported by: The Great American Wine Co. Bridgeport, CT Shipped and bottled by: Weinkellerei Jos. v. Dawen Sohne Urzig/Mosel, Germany	8.8 g/liter
6. 1983 Ruster Beerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth Weinbau - Weinkellerei GMBH Burg Layen, West Germany	1.1 g/liter
7. 1980 St. Margarethener Trockenbeerenauslese Imported by: Niederthaler Hof Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Niederthaler Hof Schlossbockelheim, West Germany	6.6 g/liter
P2 8. 1979 Breitenbrunner Welschriesling Beerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth GMBH Burg Layen, West Germany	2.5 g/liter
9. 1983 Illmitzer Felsonecker Beerenauslese - Rose' (Rose' Wine) Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth Weinbau GMBH Burg Layen, West Germany	0.9 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
10. 1983 Illmitzer Kaisergarten Beerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth GMBH Burg Layen, West Germany	0.9 g/liter
11. 1983 Felser Schillingsberg Eiswein Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth Weinbau - Weinkellerei GMBH Burg Layen, West Germany	4.9 g/liter
12. 1980 Rust-Neusiedlersee Eiswein Beerenauslese - Rulander Especially selected for Kane Beverage Mart Imported by: Wein-Bauer, River Grove, Illinois Shipped by: Wein-Bauer Stockerau, Austria	5.5 g/liter
13. 1983 Podersdorfer Kaisergarten Beerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth Weinbau - Weinkellerei GMBH Burg Layen, West Germany	0.2 g/liter
14. 1979 Pamhagener (Rose' Wine) Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth Weinbau - Weinkellerei GMBH Burg Layen, West Germany	2.0 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
15. 1981 Edelstaler Kaisergarten Trockenbeerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth - Weinkellerei GMBH Burg Layen, West Germany	3.57 g/liter
16. 1981 Weidener Kaisergarten Trockenbeerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth Weinbau - Weinkellerei GMBH - Burg Layen, West Germany	3.5 g/liter
17. 1980 Edelstaler Kupferhohe Eiswein (Gewurztraminer) Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped by: Ferdinand Pieroth Weinbau - Weinkellerei GMBH Burg Layen, West Germany Bottled by: Weingut Heller, Monchhof, Austria	
18. 1980 Monchhofer Steingang Trockenbeerenauslese Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Bottled by: Weingut Heller Monchhof, Austria	

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
19. 1984 Osterreich Neusiedler See Spatlese (Karl Walden Selection) Imported by: American B. D. Co. Hawthorne, New Jersey Bottled by: Richard Trimborn Bad Kreuznach, Germany	.2 g/liter
20. 1982 Pustaqueen Gruner Veltliner Kabinett Imported by: Schlossadler Garden Grove, California Bottled and shipped by: J. Hafner Monchhof, Austria	.1 g/liter
21. 1982 Rust Neusiedlersee Spatlese Imported by: Schumacher and Sons Distr. Inc. Chicago, Illinois Shipped by: Weinkellerei St. Kunibert GmbH, Leiwen/Germany	5.6 g/liter
22. 1979 Ruster Trockenbeerenauslese (Weiss-Burgunder) Imported by: Dieder Steinman, Inc. Glendale, New York Shipped by: All Austrian Wines and Spirits Vienna, Austria	16.0 g/liter
23. 1982 Donnerskirchner Beerenauslese Bouviertraube Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Shipped and bottled by: Ferdinand Pieroth GMBH Burg Layen, West Germany	2.0 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
24. 1982 Oggauer Welschriesling (Weinbaugebiet Rust/Neusiedlersee) Imported by: Interport Corporation, Ashland, Virginia Produced by: Weingut Ges.M. B. H. Sepp Hold, St. Georgen, Austria	.5 g/liter
25. 1982 Hummelberg Welsch-Riesling Imported by: Interport Corporation, Ashland, Virginia Produced by: Weingut GmbH Sepp Hold, St. Georgen, Austria	.5 g/liter
26. 1978 Ruster Eiswein Traminer Auslese Imported by: Dieder Steinman, Inc. Glendale, New York Shipped by: All Austrian Wines and Spirits Vienna, Austria	1.5 g/liter
27. 1983 Moorhof Hubertushof Eiswein Riesling Traminer Med. Dry Imported by: Dieder Steinman, Inc. Glendale, New York Shipped by: Weingut Alexander Unger St. Margarethen, Burgenland, Austria	.1 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
28. 1981 Rust Neusiedlersee Blaufrankisch Spatlese (Red Wine) Imported by: The Great American Wine Co. Bridgeport, CT Selected by: The Vintage Wine Selections Bottled and shipped by: Weink. Johann Pfeiffer, GmbH & Co. Wittlich, Germany	.7 g/liter
29. 1983 St. Margarethener Beerenauslese Welschriesling Imported by: The Great American Wine Co. Bridgeport, CT Selected by: The Vintage Wine Selections Bottled and shipped by: Weink. Johann Pfeiffer, GmbH & Co. Wittlich, Germany	2.8 g/liter
30. 1979 Monchhofer Kaisergarten Riesling u. Traminer Beerenauslese Imported by: Pieroth Wine Imports Inc. Franklin Park, Illinois Bottled and shipped by: Ferdinand Pieroth Burg Layen, Germany	.1 g/liter
31. 1978 Illmitzer Kaisergarten Weissburgunder Spatlese Imported by: Pieroth Wine Imports Inc. Franklin Park, Illinois Bottled and shipped by: Ferdinand Pieroth Burg Layen, Germany	2.6 g/liter

(page 8) (Updated as of 11/12/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
32. 1979 Ruster Altenberg Muller Thurgau Auslese Imported Exclusively by: Wein Bauer Chicago, Illinois Shipped by: Wein Bauer Stockerau, Austria	4.1 g/liter
33. 1982 Osterreich Neusiedler See Spatlese (Karl Walden) Imported by: American B. D. Co. Hawthorne, New Jersey Bottled by: Richard Trimborn GmbH Bad Kreuznach, Germany	2.6 g/liter
34. 1983 Osterreich Neusiedler See Spatlese (Karl Walden) Imported by: American B. D. Co. Hawthorne, New Jersey Bottled by: Richard Trimborn GmbH Bad Kreuznach, Germany	5.8 g/liter
35. 1981 Rust Neusiedlersee Trockenbeerenauslese Sole U.S. Agent: The Great American Wine Co. Bridgeport, CT Imported by: Hoffman Imports Moonachie, New Jersey Bottled and shipped by: Weinbau Ewald Pfeiffer, GmbH Urzig/Mosel, Germany	1.1 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
36. 1982 Falkensteiner Gruner Veltiner Sole U.S. Agent: The Great American Wine Co. Bridgeport, CT Imported by: Hoffman Imports Moonachie, New Jersey Bottled and shipped by: Weinbau Ewald Pfeiffer, GmbH Urzig/Mosel, Germany	5.0 g/liter
37. 1982 St. Margarethener Auslese Welschriesling Sole U.S. Agent: The Great American Wine Co. Bridgeport, CT Imported by: Carew-Morris Liquor Imports Moonachie, New Jersey Bottled and shipped by: Weinbau Ewald Pfeiffer, GmbH Urzig/Mosel, Germany	1.1 g/liter
38. 1983 St. Margarethener Welschriesling Beerenauslese Sole U.S. Agent: The Great American Wine Co. Bridgeport, CT Imported by: Hoffman Import Co., Inc. Moonachie, New Jersey Bottled and shipped by: Weinbau Ewald Pfeiffer, GmbH Urzig/Mosel, Germany	4.7 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL (Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
39. 1981 Rust Neusiedlersee Traminer Trockenbeerenauslese Imported by: The Great American Wine Co., Greenwich, Connecticut Shipped and bottled by: Johann Pfeiffer, Urzig/Mosel, Germany	1.4 g/liter
40. 1982 St. Georgener Spatlese Weissburgunder Sole US Agent: The Great American Wine Co. Bridgeport, CT Imported by: Carew-Morris Liquor Imports Moonachie, New Jersey Bottled and Shipped by: Weinbau Ewald Pfeiffer, Urzig/Mosel, Germany	2.2 g/liter
41. 1982 Falkensteiner Gruner Veltliner Qualitatswein Imported by: Viviano Wine Importers, Inc. Detroit, Michigan Bottled and Shipped by: St. Charles Weinkellerei GmbH, Bernkasel-Kues, Germany	3.3 g/liter
42. 1981 Rust Neusiedlersee Trockenbeerenauslese Imported by: Viviano Wine Importers, Inc Detroit, Michigan Bottled and Shipped by: St.Charles Weinkellerei GmbH, Bernkasel-Kues, Germany	5.4 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
43. 1983 St. Margarethener Beerenauslese Welschriesling Imported by: The Great American Wine Co. Bridgeport, CT Selected by: The Vintage Wine Selections Bottled and Shipped by: Weinbau Ewald Pfeiffer, Urzig/Mosel, Germany	2.26 g/liter
44. 1979 Halbturner Kupferfels Auslese - Eiswein Imported by: Kepp Wine Imports Co. Franklin Park, IL Bottled by: Weingut Haller, Monchhof, Austria Shipped by: Ferdinand Pieroth GmbH, Burg Layen, West Germany	2.81 g/liter
45. 1980 Frauenkirchner Steingang Eiswein Imported by: Pieroth Wine Imports Franklin Park, IL Bottled and Shipped by: Weingut Morhof, St. Margarethin, Austria	.2 g/liter
46. 1979 Retzer Altenberg Gruner Veltliner Serial No. CH-79-001 White Wine Imported by: Wein Bauer Chicago, Illinois Produced by: Wein-Bauer, Stockerau, Austria	1.99 g/liter

(page 12) (Updated as of 11/12/85)

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
47. 1979 Gumpoldskirchner Rotgipfler White Wine Serial No. CH-79-004 Imported by: Wein Bauer Chicago, Illinois Produced by: Wein-Bauer, Stockerau, Austria	2.31 g/liter
48. 1979 Altenberg Riesling White Wine Serial No. CH-79-003 Imported by: Wein Bauer Chicago, Illinois Produced by: Wein-Bauer, Stockerau, Austria	1.82 g/liter
49. 1979 Rot Altenberg Red Light Wine Serial No. CH-79-005 Imported by: Wein Bauer Chicago, Illinois Produced by: Wein-Bauer, Stockerau, Austria	.82 g/liter
50. 1981 Bouvier Trockenbeerenauslese Region Rust-Neusiedlersee Imported & Specially Selected By: Viviano Wine Importers, Inc. Detroit, MI. Bottled and Shipped by: Bruder Grill Weingut Fels-Krems, Austria	19.66 g/liter

AUSTRIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL
(Continued)

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
51. 1982 Muskat Ottonel Auslese Region Rust-Neusiedlersee Imported & Specially Selected By: Viviano Wine Importers, Inc. Detroit, MI. Bottled and Shipped by: Bruder Grill Weingut Fels-Krems, Austria	.37 g/liter
52. 1982 Gruner Veltliner Spatlese Region Klosterneuberg Imported & Specially Selected By: Viviano Wine Importers, Inc. Detroit, MI. Bottled and Shipped by: Bruder Grill Weingut Fels-Krems, Austria	1.82 g/liter
53. 1982 St. Georgener Spatlese Burgenland - Rust-Neusiedlersee Imported By: John Gross & Co. Baltimore, MD. Bottled in Neumagen-Dhron, and Shipped by Intergena KG, Weinkellerei, Schermbeck/Reinland - West Germany	.78 g/liter
54. 1978 Kirchberger Konigsbutt Gruner-Veltline Eiswein-Beerenauslese Imported By: Pieroth Wine Imports, Inc. Franklin Park, Illinois Bottled By: Ferdinand Pieroth Burg Layen, West Germany	10.4 g/liter

GERMAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
1. 1984 Haus of Franz Liebfraumilch Rheinpfalz Qualitatswein A.P. No. 5 907 021 518 84 Imported by: Francis A. Bonanno Inc. Miamisberg, OH. Shipped by: Abfuller Weinkellerei Johann Falkemburg GmbH. Bernkastel-Kues	.1 g/liter
2. 1984 Haus of Franz Liebfraumilch Nahe Qualitatswein A.P. No. 1 907 021 129 84 Imported By: Francis A. Bonanno, Inc. Miamisberg, OH. Shipped By: Abfuller Weinkellerei Johann Falkenberg GMBH Bernkastel - Kues	.1 g/liter
3. 1984 Haus Frickenstein Liebfraumilch Nahe Qualitatswein A.P. No. 1 907 021 29 84 Imported by: Kozak Distributors, Inc. Detroit, MI. Shipped by: C.A. Warren GmbH. & Co. KG., Essen Bottled by: Abfuller Sommerauer Schlosbergkellerei GmbH., Sommerau Abfullort Bernkastel-Kues	.1 g/liter
4. 1982 Wolfsheimer Abtey Kabinett Rheinhessen Qualitatswein A.P. No. 4 907 183 109 84 Imported by: Pieroth Wine Imports Co. Franklin Park, Illinois Bottled by: Ferdinand Pieroth GmbH Weinbau-Weiskellerei Burg Layen	.01 g/liter

(page 2) (Updated as of 00/00/85)

GERMAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
5. 1983 Saulheimer Domherr Eiswein Rheinhessen Qualitatswein A.P. No. 4 907 183 108 84 Imported by: Baum Wine Imports, Inc. Franklin Park, Illinois Bottled by: Phillipp und Heinrich Baum Weinkellerei GmbH Bad Kreuznach	.05 g/liter
6. G 1979 Westhofener Berkloster Auslese A.P. No. 4 907 183 27 80 Imported by: Pieroth Wine Imports, Inc. Franklin Park, Illinois Bottled By: Ferdinand Pieroth Burg Layen, West Germany	.1 g/liter
7. 1984 Bad Durkheimer Feuerberg Kabinett A.P. No. 5 907 183 66 85 Imported By: Pieroth Wine Imports Co. Franklin Park, Illinois Bottled By: Ferdinand Pieroth GMBH Weinbau-Weinkellerei Burglayen, West Germany	.005 g/liter

(page 1) (Updated as of 00/00/85)

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
1. 1981 Barbera D'Asti Imported By: Down East Importing Co. Bedford, N.H. Bottled By: F. Lli Dogliani S.p.A. La Morra, Italy	.03 g/liter
2. 1980 Barbaresco Imported By: Down East Importing Co. Bedford, N.H. Bottled By: F. Lli Dogliani S.p.A. La Morra, Italy	.05 g/liter
3. Kiola Barola Imported By: Down East Importing Co. Bedford, N.H. Bottled By: FDO S.p.A. La Morra, Italy	.02 g/liter
4. 1973 Gattinara Imported By: Down East Importing Co. Bedford, N.H. Bottled By: F. Lli Dogliani S.p.A. La Morra, Italy	.04 g/liter
5. Lambrusco Imported By: Coral Wine and Spirits Miami, Florida Bottled By: Spabis S.p.A. Calmasino, Italy	.03 g/liter

(page 2) (Updated as of 00/00/85)

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
6. Asti Spumante Imported By: Down East Importing Co. Bedford, N.H. Bottled By: F. Lli Dogliani S.p.A. La Morra, Italy	.04 g/liter
7. D'Aquino Barbera D'Asti Imported By: D'Aquino Italian Importing Co. Arcadia, California Bottled By: F. Lli Dogliani S.p.A. La Morra, Italy	.03 g/liter
8. Kiola Barbaresco Imported By: Down East Importing Co. Bedford, N.H. Bottled By: FDO S.p.A. La Morra, Italy	.05 g/liter
9. Riunite Bianco Imported By: Villa Banfi Old Brookville, N.Y. Bottled By: Cantine Coop. Riunite Reggio Emilia	.009 g/liter
10.. Riunite Rosato Imported By: Villa Banfi Old Brookville, N.Y. Bottled By: Cantine Coop. Riunite Reggio Emilia	.009 g/liter

(page 3) (Updated as of 00/00/85)

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
11. Riunite Lambrusco dell Emilia Imported By: Villa Banfi Old Brookville, N.Y. Bottled By: Cantine Coop. Riunite Reggio Emilia	.009 g/liter
12. Riunite Spumante Imported By: Villa Banfi Old Brookville, N.Y. Bottled By: Cantine Coop. Riunite Reggio Emilia	.011 g/liter
13. 1979 D'Aquino Barbaresco Imported By: D'Aquino Italian Importing Co. Arcadia, California Bottled By: F. Lli Dogliani S.p.A. La Morra - Piedmont	.01 g/liter
14. 1981 Valenti Barbaresco Imported By: Philip H. Thompson Los Angeles, CA. Bottled By: FDO S.p.A. La Morra, Italy	.01 g/liter
15. 1983 Valenti Barbera d'Alba Imported By: Philip H. Thompson Los Angeles, CA. Bottled By: FDO S.p.A. La Morra, Italy	.01 g/liter
16. 1980 Valenti Barola Imported By: Philip H. Thompson Los Angeles, CA. Bottled By: FDO S.p.A. La Morra, Italy	.01 g/liter

(page 4) (Updated as of 00/00/85)

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
17. 1981 Spanna Del Piemonte Imported By: Zenith Imports Corp. Bethpage, NY Bottled By: Azienda Vinicola Castello Di Lozzolo Lozzolo, Italia	.04 g/liter
18. 1973 Valenti Gattinara Imported By: Philip H. Thompson Los Angeles, CA. Bottled By: FDO S.p.A. La Morra, Italy	.05 g/liter
19. 1978 Valenti Barola Riserva Imported By: Philip H. Thompson Los Angeles, CA. Bottled By: FDO S.p.A. La Morra, Italy	.06 g/liter
20. 1984 Contessina Vino da Tavola Vino rosa, Toscana Imported By: Pieroth Wine Imports Co. Franklin Park, Illinois Bottled By: Ferdinand Pieroth Weinbau-Weinkellerei GMBH Burg Layen, West Germany	.019 g/liter

(page 5) (Updated as of 00/00/86)

ITALIAN WINES TESTED AND FOUND TO CONTAIN DIETHYLENE GLYCOL

DESCRIPTION	DIETHYLENE GLYCOL CONTENT
21. 1982 la Nebbia bianco della provincia di Sondrio Imported By: Alseca Corporation Washington, DC Bottled By: Imbottigliato dalla Casa Vinicola Enologica Valtellinese s. p. a. Sondrio, Italy	.008 g/liter
22. 1983 Castelvecio SOAVE Classico Denominazione Di Origine Controllata Imported By: Quality Brands, Inc, Glenburnie, Maryland Bottled By: Casa Vinicola V.B.T. S.p.a. Calmasino, Italy	.003 g/liter
23. 1983 Vietti Moscato Del Piemonte mosto d'uva parzialmente fermentato IMB. SES - Castiglione T - R.I 2881/1 CN Imported By: Mayflower Imports, LTD Hyattsville, Maryland Bottled By: Dalle Cantine Vietti Castiglione Falletto	.029 g/liter
24. 1983 Vietti vino da tavola barbera del Pietmonte Imported By: Mayflower Imports, LTD Hyattsville, Maryland Bottled By: Vietti Castiglione Falletto	.008 g/liter

D. MATERIAL RELATING TO RIUNITE WINE TESTING AND REMOVAL AND NEED FOR ADDITIONAL BATF TESTING AND LABORATORY RESOURCES

MEMORANDUM TO: All Regional Directors (Compliance)

FROM: Deputy Associate Director (Compliance)

SUBJECT: Recall of Contaminated Riunite Wines

This memorandum is in response to information received by the Bureau that contaminated Riunite wines scheduled for recall are being offered for sale.

You are directed to immediately conduct retail level spot checks of a sufficient number to ensure that wholesalers in your area have conducted a complete recall of the contaminated Riunite Wine (even if prior checks have been made). Results of these checks should be forwarded to Bureau Headquarters (attn: Thomas Busey) in the form of well documented inspection reports.

If you find contaminated wine in the retail market, you should immediately initiate the following procedures:

(1) Conduct a field inspection at the retailer's premises and fully document the reasons given as to why the contaminated wine was not recalled. Affidavits should be taken or statements of interview prepared.

(2) Ensure that contaminated wine is immediately removed from the market.

(3) Meet with the appropriate wholesaler and inform him that this wine was subject to recall and should be immediately removed from the retailers' shelves. Determine why he did not do so (i.e. affidavit, etc.).

If the wholesaler or retailer refuse to comply with this recall order, additional procedures should be initiated.

(4) Attempt to gain compliance by informing the wholesaler that failure to comply with recall order will result in the initiation of proceedings against his permit.

(5) If unsuccessful, immediately notify either Thomas Busey or Norris Alford at Bureau Headquarters for coordination of seizure action with LE.

Source: Norris Alford
Chief, Product Compliance Branch
ATF
566-7595

UNITED STATES
GENERAL ACCOUNTING OFFICE
Form 307 (Dec. 66)

2/21/86

GPO : 1984 O - 452-962

All Regional Director (Compliance)

(6) Failure to comply should be documented by inspection report complete with affidavits or statements of interview.

Attention to this matter must be given your highest priority.

Robert J. Maxwell

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, D.C. 20226

Mr. John Mariani
Chairman, Villa Banfi U. S. A.
1111 Cedar Swamp Road
Old Brookville, New York 11545

Dear Mr. Mariani:

This is in response to your specific questions about ATF's position concerning our detection of diethylene glycol (DEG) in various Riunite wines.

QUESTION 1. The BATF is not taking the position that 7 to 10 parts per million of DEG in Riunite wine is harmful to health.

RESPONSE: ATF has no specific information as to the degree of harm to health that may result from consumption of wine containing DEG at levels of 7 to 10 parts per million. However, it should be noted that medical determinations are well beyond ATF's knowledge, responsibility and authority.

QUESTION 2. The BATF is not aware of any medical data that the consumption of wine containing 7 to 10 parts per million of DEG is injurious to health.

RESPONSE: ATF is not aware of any medical data that establishes the consumption of wine containing 7 to 10 parts per million is, or is not injurious to health. However, as noted above, medical determinations and/or data research are well beyond ATF's knowledge, responsibility and authority.

QUESTION 3. The BATF is not taking the position that the statements of Dr. Steven Taylor and Dr. Mark Cullen in the Banfi press release are inaccurate for the BATF is not taking the position that there is any reason for retailers to immediately clear their shelves of Riunite. Only the limited amount of Riunite subject to recall need be removed and that should be done in an orderly and business like fashion.

RESPONSE: AFT takes no position concerning the statements of Dr. Steven Taylor and Dr. Mark Cullen in the Banfi press release. ATF has not taken the position that there is any reason for retailers to immediately "clear their shelves" of all Riunite wines. ATF's only immediate concern is with those specific Riunite wines identified in the ATF press release that ATF testing has established contain small amounts of DEG.

QUESTION 4. The BATF recognizes that the limited recall of Riunite is unrelated to the recent problems with Austrian wines. We believe that Austrian wine producers, who added DEG to their wines in amounts up to 16,000 parts per million, did so intentionally. The Riunite being recalled contains only 7 to 10 parts per million DEG, and we believe that the substance was not intentionally added to the wine.

RESPONSE: There is no evidence to indicate that Riunite intentionally added DEG to the specific wines that ATF tests established contain DEG.

Please contact me if you have additional questions.

Sincerely yours,

W. T. Drake

William T. Drake
Deputy Director

CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES
WASHINGTON, D.C. 20515

ROBERT J. MRAZEK
3RD DISTRICT, NEW YORK

COMMITTEE ON
APPROPRIATIONS
WHIP AT LARGE

March 7, 1986

Mr. William T. Drake
Deputy Director
Bureau of Alcohol, Tobacco and Firearms
1200 Pennsylvania Avenue, N.W.
Washington, D. C. 20226

Dear Mr. Drake:

I would like to thank you for taking time from your busy schedule to attend the meeting in my office on March 4th, concerning Banfi Products Corporation and the recall of Riunite. As I explained to you, my principal concern is that there appears to be an organized effort by certain competitors of Banfi to prejudice the Company unfairly as a result of the discovery of minute traces of diathylene glycol (DEG) in certain Riunite wines.

On the basis of our conversation, it is my understanding: (1) that Banfi and the Bureau worked closely and harmoniously together to accomplish the recall of Riunite and that Banfi and Riunite were completely cooperative with the Bureau throughout the recall; (2) that the BATF has no information that DEG was intentionally added to Riunite wines, and that the Bureau believes that Riunite had no possible incentive to add the substance intentionally (since DEG in such extremely small amounts could have no effect on the characteristics of the wine); and 3) that the BATF required that the wine be recalled because of the presence of an unauthorized ingredient, not because the Bureau has any basis for concluding that the consumption of Riunite wines containing the minute traces of DEG found by the BATF was unsafe to consumers.

Moreover, as we discussed, Banfi has gathered substantial data establishing that the Riunite in question posed no short term or long term health risk to the consuming public. This data is based upon information provided by leading medical and scientific authorities in the United States and includes studies of the risks associated with consumption of extremely low levels of DEG over extended periods of time.

80 FOREST AVENUE, GLEN COVE, N.Y. 11542 (516) 671-8300 • 143 MAIN STREET, HUNTINGTON, N.Y. 11743 (516) 673-0900

Lastly, I was interested to learn your personal view that the BATF may not need any additional recall powers in order to protect the American public from the consumption of alcoholic beverages containing unauthorized ingredients. As you noted, the Bureau issues licenses to all alcoholic beverage importers, and the states license all wholesalers and retailers. You stressed that the BATF, acting in conjunction with state liquor authorities, has the power to revoke those licenses in the event that importers, wholesalers and retailers do not cooperate in withdrawing contaminated products from the market, and that in light of those powers, the Bureau did not encounter any difficulties in accomplishing prompt and thorough recalls of wine found to contain DEG.

I had not previously focused upon the fact that, since the Bureau regulates such a heavily controlled industry, it already has this ultimate power to ensure industry cooperation and effective recalls. As you also pointed out, what the BATF really needs is additional, sophisticated testing equipment and laboratory personnel, to enable your agency to conduct more comprehensive tests, to ensure that all alcoholic beverages subject to your jurisdiction, both domestic and imported, contain nothing but authorized ingredients. As a member of the House Appropriations Committee, I believe that my colleagues and I should be considering the wisdom of such increased funding, rather than holding hearings about possible legislation regarding the scope of the BATF's powers, which have already proven adequate to safeguard the public in connection with the recall of tainted alcoholic beverages.

I intend to contact other Members of the House on this subject in the near future.

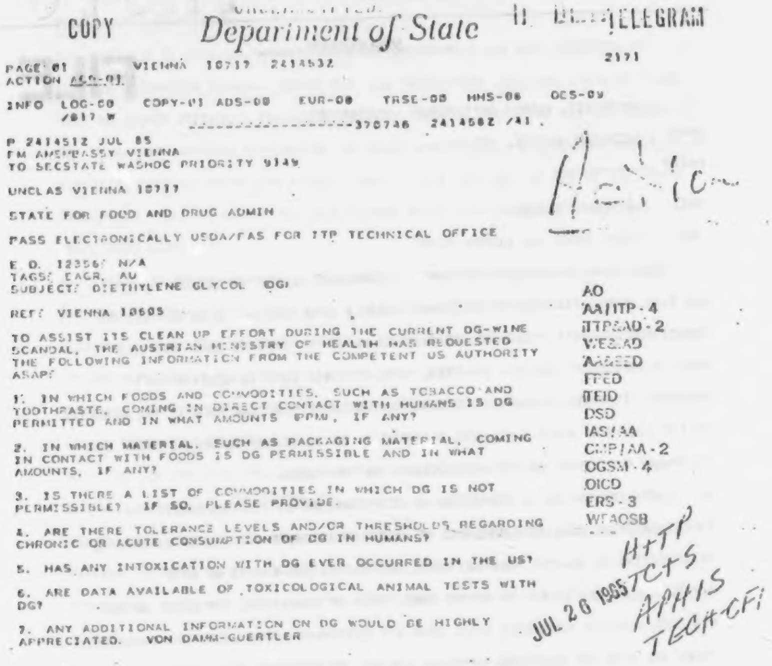
Sincerely,

Bob Mrazek

Robert J. Mrazek
Member of Congress

RJM:dsm

APPENDIX 4.—MATERIAL CONCERNING DEG TOXICITY AND RISK TO HEALTH



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PAGE 01 VIENNA 10717 241453Z
ACTION AGR-01

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UNCLAS VIENNA 10717

STATE FOR FOOD AND DRUG ADMIN

PASS ELECTRONICALLY USDA/FAS FOR ITP TECHNICAL OFFICE

E.O. 12356: N/A
TAGS: EAGR, AU
SUBJECT: DIETHYLENE GLYCOL (DG)

REF: VIENNA 10605

TO ASSIST ITS CLEAN UP EFFORT DURING THE CURRENT DG-WINE SCANDAL, THE AUSTRIAN MINISTRY OF HEALTH HAS REQUESTED THE FOLLOWING INFORMATION FROM THE COMPETENT US AUTHORITY ASAP:

1. IN WHICH FOODS AND COMMODITIES, SUCH AS TOBACCO AND TOOTHPASTE, COMING IN DIRECT CONTACT WITH HUMANS IS DG PERMITTED AND IN WHAT AMOUNTS (PPM), IF ANY?

2. IN WHICH MATERIAL, SUCH AS PACKAGING MATERIAL, COMING IN CONTACT WITH FOODS IS DG PERMISSIBLE AND IN WHAT AMOUNTS, IF ANY?

3. IS THERE A LIST OF COMMODITIES IN WHICH DG IS NOT PERMISSIBLE? IF SO, PLEASE PROVIDE.

4. ARE THERE TOLERANCE LEVELS AND/OR THRESHOLDS REGARDING CHRONIC OR ACUTE CONSUMPTION OF DG IN HUMANS?

5. HAS ANY INTOXICATION WITH DG EVER OCCURRED IN THE US?

6. ARE DATA AVAILABLE OF TOXICOLOGICAL ANIMAL TESTS WITH DG?

7. ANY ADDITIONAL INFORMATION ON DG WOULD BE HIGHLY APPRECIATED. VON DAMM-GUERTLER

Action

AO
AA/ITP-4
ITP&AD-2
WE&AD
AA&EED
FFED
ITEID
DSD
IAS/AA
CMP/AA-2
OGSM-4
OICD
ERS-3
WFAOSB

JUL 26 1985

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FOREIGN AGRICULTURAL SERVICE

FASTO

OUTGOING TELEGRAM

UNCLASSIFIED

FILE

TO : AMEMBASSY, VIENNA (ATTENTION: AGATTACHE)
FROM : TECHNICAL OFFICE, ITP
FASTO ___________

SUBJ: DIETHYLENE GLYCOL

REF: VIENNA 10605 and VIENNA 10717

1. THERE IS NO EVIDENCE OF THE USE OF DIETHYLENE GLYCOL IN TOBACCO AND FOOD COMMODITIES COMING IN DIRECT CONTACT WITH HUMANS. WITH RESPECT TO TOOTHPASTE OR OTHER COSMETICS, WE HAVE NO REASON TO BELIEVE THAT THEY MAY CONTAIN DIETHYLENE GLYCOL. HOWEVER, IF A COSMETIC WERE TO CONTAIN THIS COMPOUND, IT WOULD BE CONSIDERED ADULTERATED UNDER U.S. LAW ONLY IF THE QUANTITY OF THE COMPONENT WOULD CAUSE THE COSMETIC TO BE INJURIOUS TO HEALTH UNDER THE CUSTOMARY CONDITIONS OF USE OR AS STATED ON THE LABEL.

2. DIETHYLENE GLYCOL IS PERMITTED AS AN INGREDIENT IN THE PREPARATION OF ADHESIVES TO BE USED AS COMPONENTS OF ARTICLES INTENDED FOR USE IN PACKAGING, TRANSPORTING OR HOLDING FOOD BUT SHALL NOT EXCEED THE LIMITS OF GOOD MANUFACTURING PRACTICE. TO ASSURE SAFE USAGE OF ADHESIVES, THE LABEL OF THE FINISHED ADHESIVE CONTAINER SHALL BEAR THE STATEMENT "FOOD PACKAGING ADHESIVE". THERE ARE OVER 400 COMPOUNDS APPROVED FOR USE IN PREPARING ADHESIVES, DIETHYLENE

- CONTINUED -

DRAFTED BY		CLEARANCES			
FAS:ITP:TPPAD:SFertig mt:344-1715:8-12-85	Check if confirmation copy needed	FAS/ITP JHudson ☐	FAS/ITP BWadsworth ☐	FAS/AO GNicks ☐	☐
		☐	☐	☐	☐

UNCLASSIFIED

FAS-432 (Rev. 6-76)

(FAS-432 (Rev. 7-72 is now obsolete.)

GLYCOL IS ONLY ONE OF THAT NUMBER. MANY OF THESE COMPOUNDS ARE SUBJECT TO PPESCRIBED LIMITATIONS.

3. THERE IS NO OFFICIAL LISTING OF COMMODITIES THAT ARE NOT PERMITTED TO CONTAIN DIETHYLENE GLYCOL. UNDER U.S. LAW SUBSTANCES THAT ARE ADDED TO FOODS MUST BE EITHER GENERALLY RECOGNIZED AS SAFE (GRAS), PERMITTED FOR THE SPECIFIC USE BY A FOOD ADDITIVE REGULATION, OR PRIOR SANCTIONED. A FOOD THAT CONTAINS AN ADDITIVE, SUCH AS DIETHYLENE GLYCOL, THAT IS NOT INCLUDED IN ONE OF THE ABOVE CATEGORIES WOULD BE CONSIDERED ADULTERATED UNDER THE LAW AND SUBJECT TO REGULATORY SANCTIONS.

4. THERE ARE NO TOLERANCES. DIETHYLENE GLYCOL IS NOT ALLOWED FOR DIRECT ADDITION TO FOOD. WHERE IT MAY BE A CONTAMINANT IN A FOOD ADDITIVE, E.G. POLYETHYLENE GLYCOL, THE FOOD CHEMICAL CODEX SETS A SPECIFICATION MAXIMUM LIMIT OF NOT MORE THAN 0.25% ETHYLENE GLYCOL AND DIETHYLENE GLYCOL, INDIVIDUALLY OR COMBINED. AT THE USE LEVELS OF POLYETHYLENE GLYCOLS THE EXPOSURE TO DIETHYLENE GLYCOL WOULD BE VERY LOW.

5. YES! IN THE 1938 SULFANILAMIDE ELIXIR EPISODE, A NUMBER OF DEATHS AND INJURIES OCCURRED AS A RESULT OF PATIENTS CONSUMING THE ELIXIR WHICH USED DIETHYLENE GLYCOL AS THE SOLVENT AND VEHICLE. THE DIETHYLENE GLYCOL CAUSED OXALATE CRYSTALS IN THE KIDNEYS AND SEVERE KIDNEY DAMAGE. 25 ML'S OF DIETHYLENE GLYCOL OR ABOVE WAS FATAL IN HUMANS IN ABOUT 30% OF THE CASES OF INJURY.

6. YES. STUDIES DONE IN RATS SHOW OXALATE CRYSTALS IN URINE AT .4% & 2% DIETHYLENE GLYCOL IN THE DIET FOR 225 DAYS, OXALATE EXCRETION IN URINE AT 0.17% OF DIET, AND A NO-EFFECT LEVEL AT ONLY 0.085 OF THE DIET (ABOUT 50 MG DIETHYLENE GLYCOL PER KG B.W. OF RATS). ANOTHER STUDY IN RATS FOR 2 YEARS SHOWED BLADDER STONES AT 1% AND BLADDER TUMORS AND STONES AT 2% AND 4% DIETHYLENE GLYCOL IN THE DIET. DIRECT EXTRAPOLATION WITH NO MARGINS OF SAFETY OR SAFETY FACTOR APPLIED

WOULD MEAN A MINIMUM TOXIC EFFECT (INCREASED OXALATE EXCRETION) MAY BE SEEN AT 6 GRAMS DIETHYLENE GLYCOL/DAY, AND OXALATE CRYSTALS IN KIDNEY MAY BE SEEN AT 12 GRAMS DIETHYLENE GLYCOL/DAY. HOWEVER, THE HUMAN MAY BE MORE SUSCEPTIBLE TO TOXICITY OF DIETHYLENE GLYCOL THAN OTHER SPECIES BASED ON THE FATALITIES SEEN AT 25 ML DIETHYLENE GLYCOL OR ABOVE AND PATHOLOGICAL FINDINGS FROM THE 1938 SULFANILAMIDE ELIXIR EPISODE.

7. A PACKAGE OF DATA AND INFORMATION AND LITERATURE REFERENCES ON DIETHYLENE GLYCOL TOXICITY IS BEING SENT APO. THIS MATERIAL SHOULD BE PRESENTED TO THE AUSTRIAN HEALTH OFFICIALS.

8. THERE IS NO INFORMATION AVAILABLE REGARDING THE EFFECTS OF THE SIMULTANEOUS CONSUMPTION OF DIETHYLENE GLYCOL AND ETHANOL IN WINE ON HUMANS AND/OR TEST ANIMALS.

- END -

Excerpt - Toxicity Associated with Dyethelene Glycol - Principles of Toxicology book -

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LWang
11/20/83

T-6
1-1

reasoned to provide such a beneficial action since it enhances metabolism of formaldehyde to carbon dioxide via folate-dependent enzyme systems (30). 4-Methylpyrazole (4 MP), a potent inhibitor of alcohol dehydrogenase in animal studies, has also been suggested for use (4,27). At this time, these suggestions are still untested and unproven, and both need further clarification and clinical study. These hypotheses, if eventually proven valid, exemplify the age-old principle that when we understand the reasoning behind a physiological or biochemical event, it then becomes a much easier task to alter that event should it be necessary to do so.

ISOPROPYL ALCOHOL

Isopropyl alcohol is commonly used as a disinfectant and for rubbing onto the skin. It is a constituent of many perfumes and colognes, and personal products. Occasionally it is used as a beverage, then becoming a cause of poisoning. The fatal dose is reported to be approximately 4 to 8 ounces (10).

Initial symptoms are similar to those of ethanol intoxication, but are reported to be at least twice as severe (35). Its duration of action is also longer than ethanol. Isopropyl alcohol is converted to acetone which may be responsible for many of the symptoms of isopropyl alcohol poisoning. Manifestations of acetone toxicity and its treatment are given in Chapter 11.

GLYCOLS: ETHYLENE GLYCOL

There are numerous glycols used in many industrial applications, as hydraulic fluids and heat exchangers; in chemical syntheses; as solvents and as components of cosmetics, inks, lacquers, and various pharmaceuticals. Only ethylene glycol, however, is of current significant toxicological interest. Its toxicity is stated to be quantitatively between the extremely toxic substance, diethylene glycol, and the relatively nontoxic chemical, propylene glycol.

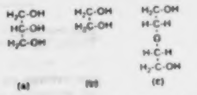

FIG. 6. Chemical structures for glycols shown in order of increasing toxicity. (a) Propylene glycol, (b) ethylene glycol, and (c) diethylene glycol.

Diethylene glycol (Fig. 6) was the culprit that caused more than 100 deaths in 1937 when it was inadvertently used as a solvent for sulfanilamide in a pharmaceutical preparation (11,36). After 2 to 5 days of consuming this "elixir" which contained 72% diethylene glycol, patients complained of nausea with vomiting, intense gastrointestinal cramping and diarrhea, and back pain referred to the kidney area. These symptoms soon led to progressive liver necrosis, renal tubular degeneration, and death. Although diethylene glycol today is not a significant source of toxicity, it is still used in several industrial processes and must always be handled with special precaution.

Ethylene glycol is most generally encountered around the home as "permanent" automotive antifreeze. It is a colorless, nonvolatile liquid having a sweet taste. Antifreeze products are usually artificially colored. Ethylene glycol is a commonly ingested poison because of its sweet taste and the "lemonade" appearance of many antifreeze products, and because it is readily available to inquisitive children from carelessly stored containers of antifreeze in the garage. It is also consumed, on occasion, by adults, for purposes of inebriation which, in its early stages, closely resembles that of ethanol. Ingested ethylene glycol can produce extremely serious symptoms, even death, with toxic doses reported at approximately 100 ml, although survival has been reported with 240 ml (28). One of the case studies reported at the end of this chapter describes a massive ingestion of 2 L, with survival.

Mechanism of Ethylene Glycol Toxicity

Ethylene glycol, like methanol, is converted to metabolites that are more toxic than the parent compound. As with ethanol, methanol, and isopropanol, the same enzyme system, alcohol

Source; Dr. [illegible]

C64311

Excerpt - Toxicity Associated with Dyethelene Glycol - Principles of Toxicology book -

1-6
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L.Wargo
11/2018

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...yc-

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...ver necrosis
...h. Although
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...d with spe-

...ally encoun-
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..., nonvolatile
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...at of ethanol
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...ml (28). One
...e end of this
...stion of 2 L.

...Toxicity

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dehydrogenase, is involved. Not all of the metabolites have been identified, but Fig. 7 illustrates possible intermediates. These toxic intermediates are responsible for producing tissue destruction and severe metabolic acidosis. Tissue damage results from the deposition of calcium oxalate crystals. Acidosis results from the accumulation of lactic acid (due to the increased alcohol dehydrogenase activity), glycolic acid, glyoxylic acid, formic acid, and oxalic acid.

Clinical Manifestations of Ethylene Glycol Toxicity

Signs and symptoms of toxicity result from the direct toxic actions of ethylene glycol or its metabolites on these target systems: brain, cardiorespiratory, and renal.

Initially, central depression develops, perhaps as severe as with ethanol, and may persist for 12 or more hours. Depression is potentiated if the patient has also consumed alcohol (13). Other CNS effects include muscle paralysis, decreased tendon reflexes, convulsions, and tetany due to hypocalcemia. These effects are usually accompanied by nausea and vomiting, ataxia, stupor, and, depending on the amount ingested, coma and death. If death occurs during the early phase of poisoning, it is due to respiratory and/or cardiac failure.

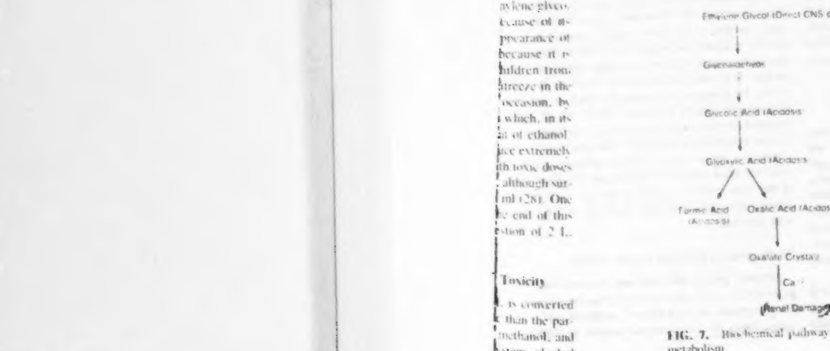

FIG. 7. Biochemical pathway for ethylene glycol metabolism.

If the patient survives the initial effects, pulmonary edema (enhanced by CNS depression), congestive heart failure, tachycardia, and renal failure develop as a result of calcium deposition. The kidney is especially susceptible since the deposition of calcium in the renal tubules produces tubular epithelial necrosis with fat inclusion, particularly in the convoluted tubules (18). Glomeruli develop thickened basement membranes and granule deposit.

Treatment of Ethylene Glycol Toxicity

The principal goal in treating ethylene glycol poisoning is to correct the acidosis with sodium bicarbonate, enhance elimination of ethylene glycol by hemodialysis, and inhibit metabolism of ethylene glycol by providing ethanol as a competitive substrate for the enzyme alcohol dehydrogenase (33,36).

Animal studies have confirmed that ethanol inhibits ethylene glycol metabolism, thus reducing its toxicity potential following ingestion (14,34). Ethanol should be given within 8 hr of ethylene glycol ingestion, and be continued for at least 5 days.

Calcium salts (e.g., calcium lactate) are sometimes recommended to replace calcium which is lost from the blood through combining with oxalate. The rationale for this recommendation is not clear. Calcium is probably not needed for routine cases because the body can usually maintain a normal calcium homeostasis.

PROPYLENE GLYCOL

Propylene glycol is generally reported as having a low order of systemic toxicity and, in fact, is widely used as a solvent for numerous pharmaceutical products. However, reports in the literature suggest that propylene glycol may be toxic if it is used inappropriately (1,25). In a few susceptible children, ingesting a propylene-glycol-based product for long periods has caused

Source; Dr. [illegible], GWU Hospital [illegible], [illegible]

UNITED STATES
GENERAL ACCOUNTING OFFICE
Form 307 (Dec. 66)

Ilustr. A —

FILE

Kokoski

ROUTING AND TRANSMITTAL SLIP

Date July 12, 1985

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Dr. S. A. Miller HFF-1		
2.		
3.		
4.		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate		For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

Sandy,

Here is the information you requested on the toxicity of diethylene glycol. It's brief and to the point. Hope this will be useful.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post) Charles J. Kokoski HFF-156	Room No.—Bldg.
	Phone No.

5041-102

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

GPO : 1982 O - 381-529 (239)

July 12, 1985

Diethylene Glycol (DEG) Toxicity

Animals:

Gaunt et al. study - Rats, 225 days, dietary.

- Oxalate Crystals in urine seen at .4% & 2%
- Oxalate Excretion in urine -

    Minumum Effect Level (MEL) at 0.17%

- No-effect Level (NEL) at 0.085% (about 50 mg/kg b.w.)

Fitzhugh & Nelson - Rats, 2 years, dietary

- Bladder stones at 1%
- Bladder tumors & bladder stones at 2% & 4%

Humans:

Calvary & Klumpp - (1939) Case studies of 1938 Sulfanilamide Elixir episode.

25 ml DEG or above was fatal in humans in about 30% of the cases.

Extrapolation of DEG Toxicity to Humans:

- ADI (maximum acceptable daily intake) based on NEL of 0.085%, applying a 500-fold safety factor (because only 225 day study and one species), and for a 60 kg (32 lbs) person is about 6 mg DEG.
- If one extrapolates directly from rat to a 60 kg man (using no safety factor), DEG is toxic to humans as follows:

- Minimum toxic effect (increased oxalate excretion) may be seen at 6 gm DEG/day (about 5.5 ml).
- Oxylote crystals in kidney may be seen at about 12 gm DEG/day (about 11 ml).
- Calvary and Klumpp stated (1939) that man may be more susceptible than other species, which may make above levels of DEG even more toxic to humans. Their opinion was based on 25 ml of DEG being fatal in some people and on the pathological findings from the 1938 sulfanilamide elixir episode.

Diethylene Glycol is not allowed as a direct food additive in 21 CFR Food Additive Regulations. It may occur as a contaminant limited to low levels in some ethylene oxide condensates (e.g. polyethylene glycol) used as food additives. However, any purposefully added DEG to food is not authorized by the regulations and any such imported food would be considered illegal.

Charles J. Kokoski, HFF-156

---R1 ~~Cutler~~ Delgado 7/15 1A

AUSTRIAN WINE

MAINZ, WEST GERMANY (AP) -- HEALTH OFFICIALS HAVE CONFISCATED HUNDREDS OF THOUSANDS OF GALLONS OF AUSTRIAN WINE FROM WEST GERMAN SUPERMARKETS BECAUSE IT COULD CONTAIN A DEADLY CHEMICAL USED TO MAKE ANTI-FREEZE, THEY SAID WEDNESDAY.

THE HEALTH MINISTRY IN RHEINLAND-PFALZ STATE, WHERE THE FEDERAL WINE REGULATION BOARD IS BASED, SAID MOST OF THE WINE TESTED SHOWED ''AN AVERAGE OF 0.5 TO 3.5 GRAMS PER LITER OF DIETHYLENE GLYCOL.''

THE WINE BOARD ACKNOWLEDGED WEDNESDAY THAT AUSTRIAN OFFICIALS HAD NOTIFIED IT IN MID-APRIL THAT THE CHEMICAL HAD TURNED UP IN SOME WINE. BUT THE EXTENT OF THE PROBLEM WAS NOT REPORTED UNTIL THIS WEEK.

AUSTRIAN AUTHORITIES HAVE CHARGED MORE THAN 20 WINE GROWERS WITH ILLEGALLY ADDING THE CHEMICAL TO THE WINE IN SMALL AMOUNTS TO ARTIFICIALLY IMPROVE THE TASTE. DIETHYLENE GLYCOL SWEETENS WINE.

THE FEDERAL HEALTH OFFICE IN WEST BERLIN SAID WEDNESDAY THAT THE WORST KNOWN CASE OF DEATHS RESULTING FROM DIETHYLENE GLYCOL OCCURRED IN THE UNITED STATES IN 1937, WHEN 100 PEOPLE DIED. THE OFFICE COULD NOT IMMEDIATELY SAY IF THAT INCIDENT INVOLVED TAINTED WINE.

ACCORDING TO THE OFFICE, A GRAM OF THE CHEMICAL FOR EVERY 2.2 POUNDS OF BODY WEIGHT IS CONSIDERED A DEADLY DOSE, WHILE A TENTH OF THAT AMOUNT CAN CAUSE PERMANENT KIDNEY DAMAGE.

THE WINES INVOLVED ARE RUSTER SPAETLESE 1983, RUSTER AUSLESE 1983, GEORGENER AUSLESE 1983 AND RUSTER NEUSIEDLERSEE SPAETLESE 1983, HEALTH OFFICIALS SAID.

SO FAR, THERE HAVE BEEN NO REPORTS OF DEATH OR INJURY FROM CONSUMPTION OF THE WINES IDENTIFIED WEDNESDAY. IT WAS NOT IMMEDIATELY KNOWN HOW MANY BOTTLES OF THE WINE ALREADY HAD BEEN SOLD.

SWISS HEALTH AUTHORITIES SAID WEDNESDAY THEY WOULD BEGIN CHECKING THE AUSTRIAN WINES.

THE WINE WAS SEIZED MAINLY IN SUPERMARKETS IN WEST GERMANY'S 10 STATES AND BERLIN, SAID OFFICIALS, WHO DEMANDED ANONYMITY. THEY CONTINUED TO SEARCH FOR MORE TAINTED WINE WEDNESDAY .

AP-WX-07-10-85 1942EDT

7/15/85 Mike Breen called on this,

[redacted]

which was read to him. CEB

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Freese
log 1

"German Tests Conclude On
Adulterated Wines"

German Tests Conclude On Adulterated Wines

NYT 3/19/86.

Cf. RECORD 86-112 3/19/86

MAINZ, West Germany, March 18 (Reuters) — An inquiry into the spiking of wines with a chemical used in antifreeze has ended with the finding that 684 foreign wines had been tainted with traces of diethylene glycol.

The state health ministry of Rhineland Palatinate, West Germany's main wine-growing area, began the investigation last May and carried out tests on some 3,000 foreign and West German wines. The ministry said that all but 36 of the doctored wines had come from Austria.

The discovery that Austrian wines had been spiked with the chemical sparked a scandal and drastically reduced Austria's wine exports. Ingestion of the chemical can cause liver and kidney damage.

A total of 87 West German wines were found to contain traces of diethylene glycol, but only 16 had more than one gram of the chemical per liter.

A report from the Food and Drug Administration last year found that a dose of 25 grams of the chemical could be lethal. Ingested in sufficient quantities, the chemical can cause convulsions, respiratory failure and coma. The report determined that six grams was enough to make one feel nauseated and that ingestion of 12 grams could cause kidney problems.

According to a ministry statement: "There is no evidence to suggest that the glycol was directly added to the wine in Germany."

The statement said the contaminated Austrian wines had been blended with local wines in West Germany without those responsible knowing that the Austrian brands contained diethylene glycol.

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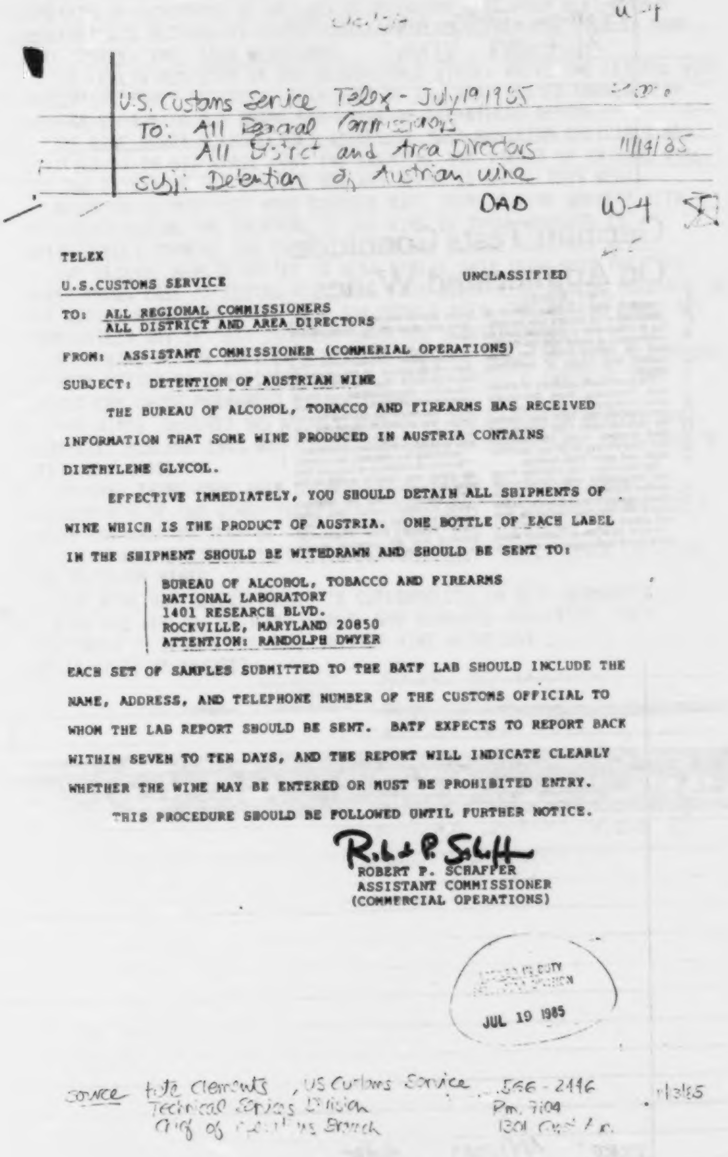
source: NYTimes 3/19/86

APPENDIX 5.—U.S. CUSTOMS SERVICE'S JULY 19, 1985, TELEX RE: DETENTION OF AUSTRIAN WINE



W-4

U.S. Customs Service Telex - July 19 1985
To: All Regional Commissioners
All District and Area Directors
11/19/85
Subj: Detention of Austrian wine

OAD W-4

TELEX

U.S.CUSTOMS SERVICE

UNCLASSIFIED

TO: ALL REGIONAL COMMISSIONERS
ALL DISTRICT AND AREA DIRECTORS

FROM: ASSISTANT COMMISSIONER (COMMERIAL OPERATIONS)

SUBJECT: DETENTION OF AUSTRIAN WINE

THE BUREAU OF ALCOHOL, TOBACCO AND FIREARMS HAS RECEIVED INFORMATION THAT SOME WINE PRODUCED IN AUSTRIA CONTAINS DIETHYLENE GLYCOL.

EFFECTIVE IMMEDIATELY, YOU SHOULD DETAIN ALL SHIPMENTS OF WINE WHICH IS THE PRODUCT OF AUSTRIA. ONE BOTTLE OF EACH LABEL IN THE SHIPMENT SHOULD BE WITHDRAWN AND SHOULD BE SENT TO:

BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
NATIONAL LABORATORY
1401 RESEARCH BLVD.
ROCKVILLE, MARYLAND 20850
ATTENTION: RANDOLPH DWYER

EACH SET OF SAMPLES SUBMITTED TO THE BATF LAB SHOULD INCLUDE THE NAME, ADDRESS, AND TELEPHONE NUMBER OF THE CUSTOMS OFFICIAL TO WHOM THE LAB REPORT SHOULD BE SENT. BATF EXPECTS TO REPORT BACK WITHIN SEVEN TO TEN DAYS, AND THE REPORT WILL INDICATE CLEARLY WHETHER THE WINE MAY BE ENTERED OR MUST BE PROHIBITED ENTRY.

THIS PROCEDURE SHOULD BE FOLLOWED UNTIL FURTHER NOTICE.

Robert P. Schaffer
ROBERT P. SCHAFFER
ASSISTANT COMMISSIONER
(COMMERCIAL OPERATIONS)

JUL 19 1985

source Kate Clements, US Customs Service 566-2446 11/3/85
Technical Services Division Rm. 7104
Chief of [illegible] Branch 1301 Const. Av.

APPENDIX 6.—MISCELLANEOUS MATERIAL

EM

MARTIN ASSOCIATES
4517 N. CARLIN SPRINGS ROAD
ARLINGTON, VIRGINIA 22203
703-522-0356

June 1, 1986

Honorable Doug Barnard, Jr.
House of Representatives
Washington, DC 20515

Dear Congressman Barnard:

It was a great pleasure to have had the opportunity to attend the recent hearings on diethylene glycol (DEG) in wine and related topic, methanol in wine, held on May 28 in RHOB Room 2247 in which you chaired.

I was also delighted in the fact that the work carried out by GAO in the investigation, as well as, the work carried out by ATF and FDA in analyzing wine for DEG was carried forward in a professional manner. Likewise, your witnesses were experts in their respective fields.

It became quite clear early in the hearings that you had great concern in the adulteration of imported foods, beverages, etc., either as the result of deleterious substances i.e., DEG and methanol in wine, pesticides in foods, radioactivity in foods as result of the Chernobyl accident or as the result of economy, i.e., use of high fructose corn syrup or cane sugar to which apple flavor is added and sold as apple juice or apple concentrate, high fructose corn syrup or cane sugar to which honey flavor is added and sold as honey, high fructose corn syrup or cane sugar to which cherry flavor is added and sold as cherry juice or cherry concentrate.

As we all know, the domestic producers of wine have considerable amount of record keeping and abridging of such records carries severe penalties while the importers of such products have no record keeping and therefore no penalties or discipline for their unscrupulous mode or modes of operations.

Being aware of your interest in the field of adulteration, I thought it would be appropriate to forward to you a chapter entitled, "Determination of the Adulteration in Food,Flavors, and Beverages by Isotopic Analyses" to be published by Elsevier Applied Science's upcoming book namely Developments in Food Analysis Techniques, Volume 4.

The above information contained in the chapter was carried out by ATF over the past decade in conjunction with, which I consider the best laboratory in the U.S. for determination of adulterants in foods, flavors, and beverages, namely the University of Georgia. The University of Georgia Department of Applied Isotopic Studies is under the supervision of Dr. John Noakes who is a world authority in isotopes and also in particular areas of applications such as the field of adulteration of foods, flavors and beverages.

Over the past decade, we as a nation have become health conscious and we want to know what is in the food and beverage we injest, the air we breath and water we drink. Therefore, I feel your hearings are of a timely nature and of great interest to American tax payer.

Again, thank you for your concern in this matter.

Sincerely,

Glenn E. Martin

T-17

BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

IMPORT/EXPORT STATISTICS OF ALCOHOL BEVERAGES

[for the top twenty-five
countries trading with
the United States]

1982-1984

Revised November 1985

UNITED STATES IMPORTS OF ALCOHOL BEVERAGES
1982, 1983, and 1984

Wines, Still, Produced From Grapes, Containing Not Over 14% Alcohol (GAL)

	1982			1983			1984			
Country	Net Quantity	Value US $	Rank	Net Quantity	Value US $	Rank	Net Quantity	Value US $	Rank	
Italy	63,023,551	238,829,000	1	63,440,762	243,442,000	1	62,898,937	240,052,000	1	$3.82/gal
France	18,050,246	188,645,000	2	22,265,805	211,174,000	2	27,871,144	259,276,000	2	9.30
FR Germany	13,197,576	98,529,000	3	15,063,004	103,337,000	3	16,034,961	101,273,000	3	~$6.32/gal
Portugal	5,053,492	28,686,000	4	4,557,641	23,605,000	4	4,861,570	24,400,000	4	5.02
Spain	1,500,750	9,188,000	5	1,333,360	8,243,000	5	1,779,718	9,974,000	5	5.60
Greece	627,131	2,838,000	6	576,981	2,520,000	7	554,205	2,266,000	7	
Yugoslavia	562,312	1,846,000	7	780,455	2,407,000	6	1,129,721	3,304,000	6	
Romania	352,782	1,271,000	8	303,173	1,007,000	10	309,565	996,000	11	
Bulgaria	294,208	1,016,000	9	374,870	1,426,000	8	435,408	1,630,000	8	
Chile	287,095	2,074,000	10	345,961	3,417,000	9	328,943	2,433,000	9	
Hungary	286,425	1,441,000	11	293,208	1,588,000	11	313,531	1,670,000	10	
Israel	257,946	1,476,000	12	271,612	1,590,000	12	283,523	1,661,000	12	
Netherlands	206,011	1,409,000	13	191,428	1,125,000	14	189,260	964,000	15	
~~Austria~~	194,622	1,524,000	14	168,329	1,404,000	15	173,665	1,253,000	16	~$7.22/gal
Argentina	189,388	958,000	15	201,983	874,000	13	223,048	977,000	13	
Australia	125,677	1,324,000	16	152,310	1,425,000	18	162,874	1,660,000	17	
Algeria	122,049	328,000	17	158,788	442,000	16	201,128	593,000	14	
Rep SAF	112,965	1,080,000	18	114,106	1,031,000	19	33,048	278,000	23	
U Kingdom	83,115	1,193,000	19	154,286	1,438,000	17	131,329	1,588,000	18	
Belgium	66,497	519,000	20	96,219	579,000	20	95,805	515,000	19	
Germany DR	38,226	328,000	21	27,565	243,000	23	13,169	77,000	27	
N Zealand	27,860	186,000	22	20,457	374,000	25	17,696	177,000	25	
Switzerland	26,622	268,000	23	32,888	316,000	22	53,805	587,000	21	
Mexico	22,994	141,000	24	23,046	111,000	24	74,163	279,000	20	
Cyprus	19,084	95,000	25	(no listing)			9,686	50,000	29	
Canada	18,943	135,000	26	33,709	215,000	21	46,897	295,000	22	
China M	16,144	166,000	27	16,491	129,000	27	16,064	150,000	28	
Japan	13,267	69,000	28	(no listing)			12,731	73,000	26	
Gibraltar	9,287	54,000	29	17,050	111,000	26	22,169	120,000	24	

Source: U.S. Department of Commerce, Bureau of Census, U.S. Imports. Issues of December 1982, 1983, and 1984, respectively.

UNITED STATES IMPORTS

Wine, Sherry (GAL)

General: Consumption figures Not Avail.				Imports for Consumption					
	1982			1983			1984		
Country	Net Quantity	Customs US $	Rank	Net Quancity	Customs US $	Rank	Net Quantity	Customs US $	Rank
Spain	2,025,565	25,807,000	1	2,109,252	27,294,000	1	2,150,992	26,715,000	1
U Kingdom	59,879	944,000	2	(no listing)			(no listing)		
Portugal	(no listing)			4,704	87,000	2	(no listing)		
Canada	(no listing)			(no listing)			(no listing)		

Source: U.S. Department of Commerce, Bureau of Census, for U.S. Imports. Issues of December 1982, 1983, and 1984, respectively.

Appendix 7.—BATF's August 1986 Letter Supplementing Information in its July 11, 1986, Letter to the Subcommittee

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, D.C. 20226

OFFICE OF
THE DIRECTOR

RECEIVED
AUG 5 1986
COMMERCE, CONSUMER AND
MONETARY AFFAIRS SUBCOMMITTEE

Congressman Doug Barnard, Jr.
Chairman
Commerce, Consumer, and Monetary
Subcommittee of the Committee on
Government Operations
Rayburn House Office Building
Room B
Washington, DC 20515

Dear Mr. Chairman:

The following answers are in support of the additional information provided, in writing, to your Subcommittee on July 11, 1986, concerning BATF's testimony on DEG contaminated wines.

1. Page 10 The 1530 cases of Italian wine were destroyed because of ATF's instructions to the wholesaler. The products were discovered to be contaminated in earlier testing. We instructed the wholesaler to either destroy the contaminated products or ship it back to the producer and/or shipper. The wholesaler chose to destroy the product under our supervision.

2. Page 11 The figure in question represents 19,000 cases on hand for disposition.

3. Page 12 The 6,000 bottles were in Custom's custody. They were released to the Importer from Custom's custody for destruction. See No. 1 above.

4. Page 12 See No. 1 above.

5. Page 5 Product was brought to our attention by an anonymous person. Upon investigation, we found 24 cases of contaminated Italian wine at the retailers premises. Product was removed from the market.

6. Page 20 At this time, three importers and/or wholesalers are under investigation for distributing contaminated wine to the retail market.

7. Page 23 Over the past ten years, ATF has suspended 179 permits and revoked 72 permits.

Congressman Doug Barnard, Jr.

8. Page 24 We are unable to provide you with the number of complaints we have received concerning illnesses derived from drinking wine contaminated with DEG. The majority of the complaints were received telephonically through various ATF Headquarter, Regional and Area offices.

If you need further clarification or have additional questions on the DEG contamination, please do not hesitate to contact me.

Sincerely yours,

James O. Pasco
Assistant Director
(Congressional and Media Affairs)